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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBIN LEEANN MOORE-BROWN,
individually, and as Special Administrator of the
Estate of FRED NORRIS BROWN, III; B.B.B., a
minor child d/o/b, 03/12/2009; L.L.B., a minor
child, d/o/b, 12/02/2013; and L.K.B., a minor child,
d/o/b 12/29/2018,

Plaintiffs,

v.

CITY OF NORTH LAS VEGAS (CITY OF
NORTH LAS VEGAS POLICE DEPARTMENT);
ALEXANDER CUEVAS; and DOES 1-10,
inclusive,

Defendants.

CASE NO.: 2:20-cv-01649-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINES**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs, ROBIN LEEANN MOORE-BROWN, individually, and as Special Administrator of the Estate of FRED NORRIS BROWN, III, B.B.B, a minor child d/o/b, 03/12/2009, L.L.B, a minor child, d/o/b, 12/02/2013 and L.K.B, a minor child, d/o/b, 12/29/2018 (collectively hereinafter "Plaintiffs"), and Defendants CITY OF NORTH LAS VEGAS (CITY OF NORTH LAS VEGAS POLICE

1 DEPARTMENT) (“CNLV”) and ALEXANDER CUEVAS (“CUEVAS”) (collectively
2 hereinafter the “PARTIES”), by and through their counsel of record, that the dispositive
3 motion deadline date of November 24, 2021, be continued to December 23, 2021, the deadline
4 to file any opposition shall be January 24, 2022 and the deadline to file any reply be February
5 7, 2022, for the purpose of allowing the parties to determine if settlement discussions are
6 appropriate.

7 **IV. PROPOSED EXTENDED DEADLINES**

8 The parties respectfully request this Court enter and order as follows:

9 **A. Dispositive Motions.**

10 The parties shall file dispositive motions on December 23, 2021.

11 **B. Joint Pre-Trial Order.**

12 The parties shall submit the Joint Pretrial Order, pursuant to LR 26(1)(e)(5) thirty (30)
13 days after the date set for filing dispositive motions, on January 24, 2022, unless dispositive
14 motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended
15 until thirty (30) days after the decision on the dispositive motions or further order of this Court.
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17 This request for an extension is made in good faith and joined by all the parties in this
18 case. Trial is not yet set in this matter. Accordingly, this extension will not delay this case.
19 Moreover, since this request is a joint request, neither party will be prejudiced. The extension

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1 will allow the parties the necessary time to determine whether settlement discussions are
2 appropriate.

3 DATED: November 17, 2021

DATED: November 17, 2021

4 NORTH LAS VEGAS CITY ATTORNEY

PETER GOLDSTEIN LAW CORP

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6 By /s/ Noel E. Eidsmore.
7 Micaela Rustia Moore, Nev. Bar No. 9676
8 City Attorney
9 Noel E. Eidsmore, Nev. Bar No. 7688
10 Chief Deputy City Attorney
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13 *Attorneys for Defendants*

By /s/ Peter Goldstein.
Peter Goldstein, Nev. Bar No. 6992
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 891145
Attorneys for Plaintiffs

14 **IT IS SO ORDERED.**

15 Dated this 17 day of November, 2021

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19 Gloria M. Navarro, District Judge
20 UNITED STATES DISTRICT COURT
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