

1 MELANIE A. HILL, ESQ.  
 Nevada Bar No. 8796  
 2 **MELANIE HILL LAW PLLC**  
 1925 Village Center Circle, Suite150  
 3 Las Vegas, NV 89134  
 4 Tel.: (702) 362-8500  
 Fax.: (702) 362-8505  
 5 Email: [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)  
*Attorneys for Plaintiff Steven Earl Carr*

6  
 7  
 8  
 9  
 10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 STEVEN EARL CARR, an individual,  
 13  
 Plaintiff,  
 14  
 v.  
 15 UNITED STATES OF AMERICA; DAVID  
 16 N. KARPEL, individually, DOES 1 through  
 100; and ROES 1 through 100; inclusive,  
 17  
 Defendants.  
 18  
 19

Case No.: 2:20-cv-01850-GMN-NJK

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME FOR PLAINTIFF  
 TO RESPOND TO MOTION TO DISMISS  
 FILED BY DEFENDANTS UNITED STATES  
 OF AMERICA AND DAVID N. KARPEL  
 [ECF No. 26] AND FOR DEFENDANTS TO  
 FILE THEIR REPLY**

**(First Request)**

20 NOW COMES the Plaintiff, STEVEN EARL CARR, by and through his attorneys, Melanie  
 21 A. Hill and Melanie Hill Law PLLC, and Defendants UNITED STATES OF AMERICA and DAVID  
 22 N. KARPEL, by and through their attorneys, Assistant United States Attorney Gregory Addington,  
 23 who hereby stipulate that Plaintiffs may have an extension of time from the current deadline of July  
 24 16, 2021 until August 2, 2021, within which to respond to the Defendants’ Motions to Dismiss [ECF  
 25 No. 26]. The parties further stipulate that Defendants shall have an extension of time from the current  
 26 deadline of July 23, 2021 until August 23, 2021 to file their reply in support of the Motion to Dismiss  
 27 [ECF No. 26]. This Stipulation is made at the request of all parties for the reasons set forth herein  
 28

1 and this is the first request for an extension of the deadlines to respond and reply to the pending  
2 Motion to Dismiss [ECF No. 26].

3 In support of this Stipulation and Order, the parties state as follows:

4 1. The second amended complaint was filed in this case on July 2, 2021 [ECF No. 25] after  
5 the Court entered an Order granting Plaintiff's Motion for Leave to File Proposed Second Amended  
6 Complaint and denying Defendants' Motion to Dismiss as moot on July 2, 2021 [ECF No. 24].

7 2. Defendants filed their Motion to Dismiss Plaintiff's Second Amended Complaint on July  
8 2, 2021 [ECF No. 26].

9 3. Counsel for all parties have conferred regarding Plaintiffs' request for an extension of the  
10 response deadline given her vacation from July 2, 2021 until July 14, 2021, and counsel for the  
11 Defendants has agreed to the requested extension. Defendants have also requested an extension of  
12 their reply deadline due to their early August vacation and Plaintiff has agreed.

13 4. This stipulation and order are being brought in good faith and is not sought for any  
14 improper purpose or other purpose of delay, but to allow counsel for the parties' additional time to  
15 respond and reply to the motion to dismiss and brief the necessary issues raised in the motion to  
16 dismiss due to their summer vacation schedules and unavailability.  
17  
18  
19  
20  
21  
22  
23  
24  
25

26 ///

27 ///

28 ///

1 WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff  
2 to respond to Defendants' Motion to Dismiss [ECF No. 26] from the current deadline of July 16,  
3 2021 until August 2, 2021. The parties further respectfully request that the Court extend the deadline  
4 for Defendants to file their reply from the current deadline of July 23, 2021 until August 23, 2021.

5 DATED this 13th day of July, 2021.

6 Respectfully submitted,

7 MELANIE HILL LAW PLLC

8 */s/ Melanie A. Hill*

9  
10  
11 

---

Melanie A. Hill, Esq. (NV Bar No. 8796)  
12 1925 Village Center Circle, Suite 150  
13 Las Vegas, NV 891034  
14 Tel.: (702) 362-8500  
15 Email: [Melanie@MelanieHillLaw.com](mailto:Melanie@MelanieHillLaw.com)  
16 *Attorney for Plaintiff Steven Earl Carr*

7 Respectfully submitted,

8 CHRISTOPHER CHIOU  
9 Acting United States Attorney

10 */s/ Gregory Addington*

11 

---

Gregory Addington (NV Bar No. 6875)  
12 Assistant United States Attorney  
13 400 South Virginia Street, Suite 900  
14 Reno, NV 89501  
15 Tel.: (775) 784-5438  
16 Email: [Greg.Addington@usdoj.gov](mailto:Greg.Addington@usdoj.gov)  
17 *Attorney for Defendants United States of  
18 America, David L. Jaffe, and David N. Karpel*

18 **IT IS SO ORDERED.**

19 Dated this 14 day of July, 2021.

20  
21   
22 

---

Gloria M. Navarro, District Judge  
23 UNITED STATES DISTRICT COURT