

1 DENNIS M. PRINCE
2 Nevada Bar No. 5092
2 KEVIN T. STRONG
3 Nevada Bar No. 12107
3 **PRINCE LAW GROUP**
4 10801 W. Charleston Boulevard
5 Suite 560
5 Las Vegas, Nevada 89135
5 Tel: (702) 534-7600
5 Fax: (702) 534-7601
6 Email: eservice@thedplg.com
6 Attorneys for Plaintiff
7 *Debbie Siegfried*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DEBBIE SIEGFRIED, individually,

11 Plaintiff,

12 vs.

13 LOYA INSURANCE COMPANY, a
14 Foreign Corporation; and JESS LOPEZ,
15 individually; DOES I through X; and ROE
16 BUSINESS ENTITIES I through X,
17 inclusive,

18 Defendants.

19 CASE NO.: 2:20-cv-01905-KJD-DJA

20 **JOINT MOTION TO EXTEND THE
21 DEADLINE FOR DEFENDANT
22 LOYA INSURANCE COMPANY TO
23 FILE ITS REPLY IN SUPPORT OF
24 MOTION FOR PROTECTIVE
25 ORDER REGARDING PLAINTIFF
26 DEBBIE SIEGFRIED'S
27 DEPOSITION SUBPOENA TO THE
28 F.R.C.P. 30(b)(6)
29 REPRESENTATIVE FOR LOYA
30 INSURANCE COMPANY (ECF No.
31 51)
(First Request)**

32 Plaintiff DEBBIE SIEGFRIED ("Siegfried"), by and through her counsel of record,
33 Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant LOYA
34 INSURANCE COMPANY ("Loya"), by and through its counsel of record, M. Bradley
35 Johnson of KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD., hereby file their
36 *Joint Motion to Extend the Deadline for Defendant Loya Insurance Company to File its
37 Reply in Support of Motion for Protective Order Regarding Plaintiff Debbie Siegfried's
38 Deposition Subpoena to the F.R.C.P. 30(b)(6) Representative for Loya Insurance
39 Company (First Request).*

40 . . .

41

MEMORANDUM OF POINTS AND AUTHORITIES

I.

LEGAL ARGUMENT

4 “[D]istrict courts . . . retain broad discretion to control their dockets”
5 *Shahrokhi v. Harter*, No. 2:21-cv-01126-RFB-NJK, 2021 U.S. Dist. LEXIS 247936, at *4
6 (D. Nev. Dec. 30, 2021). Siegfried and Loya hereby respectfully move this Court to extend
7 the deadline for Loya to file its Reply in Support of its Motion for Protective Order (ECF
8 No. 51) by fourteen (14) days, from November 15, 2022 to November 29, 2022. Loya filed
9 its Motion for Protective Order on October 25, 2022. Siegfried filed her Response on
10 November 8, 2022 (ECF No. 53). Siegfried and Loya hereby submit this Joint Motion in
11 accordance with LR IA 6-1. This is the parties’ first joint motion for extension of time for
Loya to file its Reply in Support of its Motion for Protective Order.

12 Siegfried and Loya respectfully request an extension of the reply deadline.¹
13 Siegfried and Loya were scheduled to participate in a second mediation of this matter
14 on November 16, 2022 in an effort to resolve this matter. However, on November 15,
15 2022, the parties learned that Loya’s representative is unable to attend the scheduled
16 mediation due to the death of one of his colleagues. As the parties attempt to reschedule
17 their mediation for a separate date, Siegfried and Loya have mutually agreed to allow
18 Loya additional time to complete its Reply because Loya devoted substantial time and
19 resources to prepare for the second mediation. The proposed extension of time will allow
Loya the requisite time to fully address the arguments Siegfried made in her Response.

II.

CONCLUSION

22 Based on the foregoing, Plaintiff Debbie Siegfried and Defendant Loya Insurance
23 Company respectfully request this Court to **GRANT** their Joint Motion to Extend the
24 Deadline for Defendant Loya Insurance Company to File its Reply in Support of Motion

26 ¹ Siegfried and Loya hereby file this joint motion in lieu of a stipulation because
27 Defendant Jess Lopez is a Defendant in this action who has not filed an answer or
28 otherwise made an appearance. *See LR 7-1(c)* (“A stipulation that has been signed by
fewer than all the parties or their attorneys will be treated—and must be filed—as a joint
motion).

1 for Protective Order Regarding Plaintiff Debbie Siegfried's Deposition Subpoena to the
2 F.R.C.P. 30(b)(6) Representative for Loya Insurance Company (First Request).
3 DATED this 15th day of November, 2022. DATED this 15th day of November, 2022.

4 **PRINCE LAW GROUP**

**KRAVITZ, SCHNITZER JOHNSON &
WATSON, CHTD.**

7 /s/ Kevin T. Strong
8 DENNIS M. PRINCE
Nevada Bar No. 5092
9 KEVIN T. STRONG
Nevada Bar No. 12107
10 10801 W. Charleston Boulevard
Suite 560
11 Las Vegas, Nevada 89135
Tel: (702) 534-7600
12 Fax: (702) 534-7601
Attorneys for Plaintiff
13 *Debbie Siegfried*

/s/ M. Bradley Johnson
M. BRADLEY JOHNSON
Nevada Bar No. 4646
8985 S. Eastern Avenue
Suite 200
14 Las Vegas, Nevada 89123
Tel: (702) 322-4126
Fax: (702) 362-2203
15 Attorneys for Defendant
Loya Insurance Company

16 **IT IS SO ORDERED.**

17 DATED: November 16, 2022

18 
19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE

21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I am an employee of PRINCE LAW GROUP and that on the 15th day of November, 2022, I electronically filed the foregoing document entitled **JOINT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT LOYA INSURANCE COMPANY TO FILE ITS REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER REGARDING PLAINTIFF DEBBIE SIEGFRIED'S DEPOSITION SUBPOENA TO THE F.R.C.P. 30(b)(6) REPRESENTATIVE FOR LOYA INSURANCE COMPANY (ECF No. 51) (First Request)** with the Clerk of the Court using the CM/ECF system, which sent a notice of electronic filing to the following:

M. Bradley Johnson
Kristopher T. Zeppenfeld
KRAVITZ, SCHNITZER & JOHNSON
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Tel: (702) 322-4126
Fax: (702) 362-2203
Attorneys for Defendant
Loya Insurance Company

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I also served the foregoing documents via First-Class United States Mail to the following address:

Jess Lopez
8744 Raindrop Canyon
Las Vegas, Nevada 89129

/s/ Kevin T. Strong
An Employee of Prince Law Group