

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL
CRYSTAL J. HERRERA, ESQ.
Nevada Bar No. 12396
5100 West Sahara Avenue
Las Vegas, Nevada 89146
Telephone: (702) 799-5373
Facsimile: (702) 799-7243
Herrec4@nv.ccsd.net
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada, and
the BOARD OF TRUSTEES OF THE CLARK
COUNTY SCHOOL DISTRICT, in their official
capacities,

Defendants.

Case No.: 2:21-cv-00023-GMN-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE REPLY IN
SUPPORT OF THEIR MOTION TO
DISMISS**

(FIRST REQUEST)

Plaintiff Sara Quintana and Defendants Clark County School District (“School District”) and the Board of Trustees of the Clark County School District (“Board;” collectively, “Defendants”), by and through their respective counsel of record, hereby stipulate to extend the time for Defendants to file a reply in support of their Motion to Dismiss (ECF No. 6) from the current deadline of February 17, 2021 for seven (7) days, up to and including **February 24, 2021**. (ECF No. 13). This is the first request for an extension of time for this deadline.

Defendants seek the extension of time to allow sufficient time to prepare an appropriate reply. Defendants filed a Motion to Dismiss on January 13, 2021 (ECF No. 6). Plaintiff filed a Response on February 10, 2021, after receiving a two-week extension (ECF No. 11). Accordingly, the deadline for Defendants to file a reply in support of their Motion to Dismiss is February 17, 2021. Counsel requires additional time to evaluate and address Plaintiff’s

1 response to administrative exhaustion concerns. Defendants' counsel will also be taking time
2 off through February 16, 2021 in light of the long weekend and will be unable to properly
3 evaluate and prepare a reply by the current responsive deadline.

4 Based on the foregoing, the parties hereby stipulate to a short extension of time, until
5 February 24, 2021, for Defendants to file a reply to their Motion to Dismiss. The one (1) week
6 extension will have no significant or prejudicial impact on the proceedings. This request is
7 made in good faith and not for the purpose of delay.

8 Dated: February 12, 2021.

9 CLARK COUNTY SCHOOL DISTRICT
10 OFFICE OF THE GENERAL COUNSEL

11 By: Crystal J. Herrera
12 Crystal J. Herrera (#12396)
13 5100 West Sahara Avenue
14 Las Vegas, Nevada 89146
15 *Attorney for Defendants*

16 Dated: February 12, 2021.

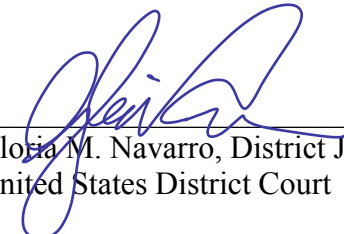
17 KEMP & KEMP

18 By: James P. Kemp
19 James P. Kemp, Esq. (#6375)
20 Victoria L. Neal, Esq. (#13382)
21 7435 W. Azure Dr., Ste. 110
22 Las Vegas, NV 89130
23 *Attorney for Plaintiff*

24 **ORDER**

25 **IT IS SO ORDERED.**

26 Dated this 16 day of February, 2021.

27 
28 Gloria M. Navarro, District Judge
United States District Court