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*Attorneys for Defendants,  
Las Vegas Metropolitan Police Department,  
Colin Haynes, Lt. Nathan Chio*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT COACHE, an Individual,  
  
Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a government entity;  
CLARK COUNTY, a political subdivision of  
the State of Nevada and a government entity;  
MARC DIGIACOMO, an individual and an  
employee of a government entity; SARAH E.  
OVERLY, an individual and an employee of a  
government entity; COLIN HAYNES, an  
individual and an employee of a government  
entity; NATHAN CHIO, an individual and an  
employee of a government entity; and DOES  
1-30,  
  
Defendants.

Case No.: 2:21-cv-01334-RFB-BNW

**JOINT MOTION TO EXTEND TIME  
FOR LVMPD DEFENDANTS TO  
ANSWER OR OTHERWISE RESPOND  
TO THE COMPLAINT  
(FIRST REQUEST)**

Defendants Las Vegas Metropolitan Police Department, Colin Haynes and Lt.  
Nathan Chio (collectively “LVMPD Defendants”), by and through their counsel Kaempfer  
Crowell, and Plaintiff Robert Coache, by and through his counsel Ralph Schwartz from Ralph  
Schwartz, PC and Edwin Brown from Brown Clark Le Ames Stedman & Cevallos LLP (*Pro*

1 *Hac Vice pending*) submit this Joint Motion to Extend Time for LVMPD Defendants to Answer  
2 or Otherwise Respond to the Complaint (First Request).

3 1. On July 14, 2021, Plaintiff filed his Complaint. The LVMPD Defendants were  
4 served on November 1, 2021. The current deadline for LVMPD Defendants to answer or  
5 otherwise respond by motion to Plaintiff's Complaint is November 22, 2021.

6 2. On Wednesday, November 10, 2021, counsel for LVMPD Defendants  
7 communicated with Plaintiff's Counsel via phone regarding a two-week extension within which  
8 to file a response to the Complaint, and Plaintiff's Counsel agreed to the extension.

9 3. The requested extension is necessary to ensure that LVMPD Defendants' Counsel  
10 has adequate time to review all pleading allegations, accurately respond to each, and form  
11 defenses at this preliminary stage.

12 4. This Joint Motion is made in good faith and not for the purposes of delay.

13 5. Plaintiff has agreed to extend the deadline in which LVMPD Defendants respond  
14 by motion or pleading to Plaintiff's Complaint up to and including December 6, 2021. This is the  
15 first motion for extension of time for LVMPD Defendants to respond to Plaintiff's Complaint

16 DATED this 17th day of November, 2021.

17 KAEMPFER CROWELL

RALPH A. SCHWARTZ, PC

18 By: /s/ Lyssa S. Anderson  
19 LYSSA S. ANDERSON  
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21 ***Attorneys for Defendants,***  
22 ***Las Vegas Metropolitan Police***  
***Department, Colin Haynes, Lt. Nathan***  
23 ***Chio***

By: /s/ Ralph A. Schwartz  
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***Attorneys for Plaintiff, Robert Coache***

**Order**

IT IS SO ORDERED

DATED: 4:46 pm, November 18, 2021



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE