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13 Las Vegas Metropolitan Police Department,
14 Colin Haynes, Lt. Nathan Chio*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 ROBERT COACHE, an Individual,

18 Plaintiff,

19 vs.

20 LAS VEGAS METROPOLITAN POLICE
21 DEPARTMENT, a government entity;
22 CLARK COUNTY, a political subdivision of
23 the State of Nevada and a government entity;
24 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,

25 Defendants.

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

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

31 Defendants Las Vegas Metropolitan Police Department, Colin Haynes and Lt.
32 Nathan Chio (collectively “LVMPD Defendants”), by and through their counsel Kaempfer
33 Crowell, and Plaintiff Robert Coache, by and through his counsel Ralph Schwartz from Ralph
34 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

18 By: /s/ Lyssa S. Anderson
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Attorneys for Plaintiff, Robert Coache

23 Order

24 IT IS SO ORDERED
DATED: 4:46 pm, November 18, 2021


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE