

1 KRISTINA WILDEVELD, ESQ.
 Nevada Bar No. 5825
 2 LISA RASMUSSEN, ESQ.
 Nevada Bar No. 7491
 3 RICHARD BRYANT, ESQ
 Nevada Bar No. 15511
 4 **THE LAW OFFICE OF KRISTINA WILDEVELD & ASSOCIATES**
 550 E. Charleston Blvd., Suite A
 5 Las Vegas, NV 89101
 Phone (702) 222-0007
 6 Fax (702) 222-0001
Lisa@Veldlaw.com, Richard@Veldlaw.com,
 7 Kristina@Veldlaw.com

8 Attorneys for Plaintiff, Frank LaPena

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

11	FRANK LAPENA,)	CASE NO. 2:21-cv-2170 JCM-NJK
12)	DEPT. NO.
13	Plaintiff,)	
14	vs.)	UNOPPOSED MOTION TO EXTEND
15	LAS VEGAS METROPOLITAN POLICE)	TIME TO FILE RESPONSE TO CLARK
16	DEPARTMENT, a government entity; et al)	COUNTY AND CCDA DEFENDANTS'
17)	PARTIAL MOTION FOR JUDGMENT ON
18	Defendants.)	THE PLEADINGS [ECF 8]

19 COMES NOW the Plaintiff, FRANK LAPENA, by and through his counsel, Lisa
 20 Rasmussen and the Law Offices of Kristina Wildeveld & Associates and hereby moves this
 21 Court for an Order extending the time for him to file a Response to Clark County and te Clark
 22 County DA Defendants' Motion for Partial Judgment on the Pleadings, filed on December 16,
 23 2021 at ECF 8 for a period of three weeks, until January 27, 2022. This Motion is unopposed by
 24 counsel for the Clark County and Clark County DA defendants and is based upon the following:

- 25 1. Mr. LaPena filed an Amended Complaint on today's date. [See ECF 24.]
- 26 2. Counsel for Mr. LaPena wanted to give opposing counsel for all defendants an
- 27 opportunity to determine whether they wanted an opportunity to amend their pending
- 28 motions in light of the Amended Complaint.

1 3. The undersigned has conferred with counsel for the Clark County defendants and he is
2 not opposed to this request for an extension of three weeks (21 days), until January
3 27, 2022 to file a Response absent any additional stipulations that the parties may
4 enter.

5 4. Denial of this request would cause prejudice to Mr. LaPena. Additionally, this
6 Motion is not made for the purpose of delay and is made in good faith. The
7 undersigned has diligently worked to file an Amended Complaint that will make
8 some of the issues easier for this Court to ultimately determine.

9 Accordingly, it is respectfully requested that this Court enter an Order authorizing Mr.
10 LaPena to file his response to the Clark County Defendants' Motion on or before January 27,
11 2022.

12 DATED this 6th day of January 2022.

13 Respectfully Submitted By:

14
15 /s/ Lisa A. Rasmussen

16 LISA A. RASMUSSEN, ESQ.

17 Nevada Bar No. 007491

18 Attorneys for Plaintiff, Frank LaPena

19 **ORDER**

20 Upon the unopposed Motion of Plaintiff, and good cause appearing,

21 IT IS HEREBY ORDERED that Plaintiff shall have until January 27, 2022 to file his
22 response to the Clark County Defendants' Motion for Partial Judgment on the Pleadings (ECF
23 8).
24

25 Dated: January 10, 2022.

26 James C. Mahan

27 The Honorable James C. Mahan

28 United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a copy of the foregoing, PLAINTIFF'S UNOPPOSED MOTION FOR EOT RE: CLARK COUNTY'S PARTIAL MOTION FOR JUDGMENT, upon the following persons, via CM/ECF, this Court's mandated electronic filing system:

Mr. Thomas Dillard, Esq.
Counsel for Clark County and the CCDA Defendants

Mr. Craig Anderson, Esq.
Counsel for the LVMPD defendants

Dated this 6th day of January 2022.

/s/ Lisa A. Rasmussen

LISA A. RASMUSSEN, ESQ.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28