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JASON M. FRIERSON 1 United States Attorney District of Nevada Nevada Bar No. 7709 VIRGINIA T. TOMOVA Nevada Bar No. 12504 Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 5 (702) 388-6336 Virginia.Tomova@usdoj.gov 6 Attorneys for the United States 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 LATASHA CARROLL, an individual, Case No. 2:22-cv-01287-JCM-BNW 10 Plaintiff, Stipulation to Extend Joint Pretrial Order Deadline 11 v. (Sixth Request) 12 United States of America, through the United States Postal Service, an agency of 13 the Government of the United States of America, DOES 1 through 10, inclusive; 14 and, ROE BUSINESS ENTITIES 1 through 10 inclusive, 15 Defendants. 16 Pursuant to Fed. R. Civ. P. 6(b)(1)(B), as well as LR IA 6-1, LR 26-3, Plaintiff 17 Latasha Carroll and Defendant United States of America, by and through their undersigned 18 counsel, hereby request another extension of the joint pretrial order deadline as they are 19 working towards settling this matter. The parties request a 45-day extension of the current 20 joint pretrial order deadline of May 31, 2024. ECF No. 35. This is the sixth request for 21 extension and if granted the new deadline to file a joint pretrial order will be July 15, 2024. 22

This request is not made for the purpose of causing undue delay and prejudice. The parties

are acting in good faith to get this case resolved by continuing their settlement negotiations.

1	On May 29, 2024, Plaintiff extended a counteroffer to the Defendants, which the
2	Defendants need time to evaluate. Considering the Court's order limiting Plaintiff's
3	damages to the amount of her administrative claim (ECF No. 25), the parties believe that
4	they will be able to reach a settlement in this case. For the foregoing reasons, the parties
5	request that the Court extend the deadline for the joint pretrial order to July 15, 2024.
6	Respectfully submitted this 31st day of May 2024.
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8	JASON M. FRIERSON RALPH A. SCHWARTZ, P.C. United States Attorney
9	/s/ Virginia T. Tomova/s/ Ralph A. SchwartzVirginia T. TomovaRalph A. Schwartz, Esq.
11	Assistant United States Attorney Attorney for Plaintiff
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13	IT IS SO ORDERED:
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15	Benbucken Harring MACHER HIDGE
16	UNITED STATES MAGISTRATE JUDGE
17	DATED: (/2/2024
18	DATED: <u>6/3/2024</u>
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