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Police Department, Jacob Adams and Miguel Jahuey

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Fernando Garcia,  
11 Plaintiff,

Case Number:  
2:22-cv-01960-MMD-VCF

12 vs.

13 Corner Investment Company, LLC d/b/a The  
14 Cromwell Las Vegas, Jacob Adams, Miguel  
15 Jahuey, the Las Vegas Metropolitan Police  
16 Department, a municipality, and Does I-XX,

Defendants.

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE**

**(FIRST REQUEST)**

17 The Parties, Plaintiff Fernando Garcia (“Plaintiff”), by and through their attorneys of  
18 record, Robert A. Nersesian, Esq. and Thea Marie Sankiewicz, Esq., with the law firm of  
19 Nersesian & Sankiewicz and Defendants, Las Vegas Metropolitan Police Department  
20 (“LVMPD”), Officer Jacob Adams (“Adams”) and Officer Miguel Jahuey (“Jahuey”)  
21 (collectively “LVMPD Defendants”), by and through their attorneys of record, Craig R.  
22 Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, and  
23 hereby agree and jointly stipulate the following:

24 1. This request for an extension of time to file dispositive motions is not sought  
25 for an improper purpose or other purpose of delay. The parties are requesting a 14-day  
26 extension of the dispositive motion deadline. Additionally, counsel for LVMPD Defendants  
27 has had several depositions in the Kelly Patterson v. Las Vegas Metropolitan Police  
28 Department, et al, United States District Court, District of Nevada, Case No. 2:23-cv-00539-

1 RFB-DJA and B.H., et al. v. CCSD, et al., United States District Court, District of Nevada,  
2 Case No. 2:23-cv-00564-JCM-DJA, throughout the month of November. This is the first  
3 request for extension of time in this matter. The parties respectfully submit that the reasons  
4 set forth above constitute compelling reasons for the modest extension.

5 2. The Parties further agree, the dispositive motion deadline currently set for  
6 November 13, 2023 shall be extended to Monday, November 27, 2023.

7 3. WHEREFORE, the parties respectfully request that the Dispositive Motion  
8 be extended to and including Monday, November 27, 2023.

9 4. This Stipulation is being entered in good faith and not for purposes of delay.

10 IT IS SO STIPULATED.

11 Dated this 13th day of November, 2023.

12 NERSESIAN & SANKIEWICZ

13 By: /s/ Robert A. Nersesian  
14 Robert A. Nersesian, Esq.  
15 Nevada Bar No. 2762  
16 Thea Marie Sankiewicz, Esq.  
17 Nevada Bar No. 2788  
18 528 S. Eighth Street  
19 Las Vegas, Nevada 89101  
20 Attorneys for Plaintiff Fernando Garcia

Dated this 13th day of November, 2023.

MARQUIS AURBACH

21 By: /s/ Jackie V. Nichols  
22 Craig R. Anderson, Esq.  
23 Nevada Bar No. 6882  
24 Jackie V. Nichols, Esq.  
25 Nevada Bar No. 14246  
26 10001 Park Run Drive  
27 Las Vegas, Nevada 89145  
28 Attorneys for Defendants Las Vegas  
Metropolitan Police Department, Jacob  
Adams and Miguel Jahuey

20 **ORDER**

21 The above Stipulation is hereby GRANTED.

22 IT IS SO ORDERED.



23  
24 United States ~~District Court~~ Magistrate Judge

25 DATED: 11-13-2023

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 13th day of November, 2023.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch  
An employee of Marquis Aurbach