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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRAZIER S. SPEAKS, JR.,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal
corporation,

Defendant.

CASE NO.: 2:23-cv-00887-APG-MDC

**STIPULATION TO EXTEND DEADLINES
TO RESPOND TO CITY OF NORTH LAS
VEGAS’S MOTION TO DISMISS OR,
ALTERNATIVELY, MOTION FOR
SUMMARY JUDGMENT [ECF Nos. 21, 22]**

(First Request)

Plaintiff, Frazier S. Speaks, Jr. (“Speaks”), by and through his counsel, Melanie Hill Law, and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Kaempfer Crowell, hereby stipulate to extend the deadlines for Mr. Speaks to respond to the City of North Las Vegas’s Motion to Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21, 22] from the current deadlines of August 28, 2024 and September 4, 2024 respectively to September 27, 2024. This Stipulation is made at the request of Plaintiff’s counsel for the reasons set forth herein. This is the first request to extend the deadlines to respond to these dispositive motions.

In support of this Stipulation and Order, the parties state as follows:

1. The current deadlines to respond to the City of North Las Vegas’s Motion to Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21,

1 22] is August 28, 2024 for the Motion to Dismiss and September 4, 2024 for the Motion for Summary
2 Judgment. To deal with the discrepancy with these response deadlines being seven days apart pursuant
3 to Local Rule LR 7-2, and given that the motions were combined into one pleading such that it makes
4 the most sense to respond to them together, the parties have agreed to extend the deadlines thirty days
5 from today's date, August 28, 2024, which is Mr. Speaks' current deadline to respond to the Motion
6 to Dismiss [ECF No. 21].

7
8 2. Counsel for Plaintiff reached out to counsel for Defendant requesting the thirty-day
9 extension of the response deadlines and the parties have agreed to align the deadlines and grant Mr.
10 Speaks an extension until September 27, 2024 to respond to both motions.

11 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a
12 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to
13 allow counsel for the Plaintiff the additional time requested to respond to these two dispositive motions
14 and align the deadlines to September 27, 2024.

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