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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 AUGUSTINE CALLEROS, JR.,
 12
 13 Plaintiff,
 14 vs.
 15 CITY OF NORTH LAS VEGAS, a municipal
 16 corporation,
 17
 18 Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA
**STIPULATION TO EXTEND DEADLINES
 TO RESPOND AND REPLY TO
 DEFENDANT’S MOTION FOR
 SUMMARY JUDGMENT [ECF No. 44]**
 (Fourth Request)

19 Plaintiff, Augustine Calleros, Jr. (“Calleros”), by and through his counsel, Melanie Hill Law,
 20 and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Madison Zornes-Vela,
 21 hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant’s Motion for Summary
 22 Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 21, 2024 up
 23 to and including November 25, 2024. The parties further stipulate to extend the deadline for CNLV to
 24 reply in support of its Motion for Summary Judgment from the current deadline of December 9, 2024
 25 up to and including December 16, 2024. This Stipulation is made at the request of Plaintiff’s counsel
 26 for the reasons set forth herein. This is the fourth request to extend the deadline to respond to this
 27 dispositive motion.

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

2 1. The current deadline for Plaintiff to respond to the Defendant’s Motion for Summary
3 Judgment filed on August 28, 2024 [ECF No. 44] is November 21, 2024. The parties have agreed to a
4 fourth extension of the deadline from the current deadline of November 21, 2024 until November 25,
5 2024.

6 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional two court
7 day extension of the response deadline due to Plaintiff’s counsel’s illness that formed the basis on the
8 third stipulation because it continued through this morning and kept counsel out of the office this week.
9 Defendant’s counsel agreed to the requested extension. Counsel for Plaintiff also offered to extend the
10 CNLV’s reply deadline due to the upcoming Thanksgiving holiday next week and the parties agreed to
11 a 21-day extension of the reply deadline until December 16, 2024.

12 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a
13 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to
14 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion
15 considering the issues she has described herein constituting good cause for the short extension.

16 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the
17 deadline for Mr. Calleros to respond to Defendant’s Motion for Summary Judgment filed on August
18 28, 2024 [ECF No. 44] from the current deadline of November 21, 2024 to November 25, 2024.
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1 The parties further respectfully request that the Court extend the deadline for Defendant to file
2 its reply from the current deadline of December 9, 2024 up to and including December 16, 2024.

3 DATED this 21st day of November, 2024.

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5 Respectfully submitted,

6 MELANIE HILL LAW PLLC

7 /s/ Melanie Hill

8
9 Melanie A. Hill, Esq. (NV Bar No. 8796)

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11 Las Vegas, NV 89134

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13 *Attorney for Plaintiff Augustine Calleros, Jr.*

4
5 Respectfully submitted,

6 NORTH LAS VEGAS CITY ATTORNEY

7 /s/ Madison Zornes-Vela

8
9 Madison Zornes-Vela, Esq. (NV Bar No. 13626)

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11 North Las Vegas, Nevada 89030

12 Tel: (702) 633-1057

13 *Attorney for Defendant City of North Las Vegas*

14
15 IT IS SO ORDERED:

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17 
18 _____
19 GLORIA M. NAVARRO
20 UNITED STATES DISTRICT JUDGE

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22 Dated: November 22, 2024.