

1 MELANIE A. HILL
 2 Nevada Bar No. 8796
 3 **MELANIE HILL LAW PLLC**
 4 1925 Village Center Circle, Ste. 150
 5 Las Vegas, Nevada 89134
 6 Tel: (702) 362-8500
 7 Fax: (702) 362-8505
 8 Email: Melanie@MelanieHillLaw.com
 9 *Attorneys for Plaintiff Augustine Calleros, Jr.*

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

12 AUGUSTINE CALLEROS, JR.,
 13 Plaintiff,
 14 vs.
 15 CITY OF NORTH LAS VEGAS, a municipal
 16 corporation,
 17 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]**
 (Fifth Request)

18 Plaintiff, Augustine Calleros, Jr. (“Calleros”), by and through his counsel, Melanie Hill Law,
 19 and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Madison Zornes-Vela,
 20 hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant’s Motion for Summary
 21 Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 25, 2024 up
 22 to and including December 16, 2024. The parties further stipulate to extend the deadline for CNLV to
 23 reply in support of its Motion for Summary Judgment from the current deadline of December 16, 2024
 24 up to and including January 16, 2025. This Stipulation is made at the request of Plaintiff’s counsel for
 25 the reasons set forth herein. This is the fifth request to extend the deadline to respond to this dispositive
 26 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 25, 2024. The parties have agreed to a
4 fifth extension of the deadline from the current deadline of November 25, 2024 until December 16,
5 2024.

6 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional
7 extension of the response deadline due to an unexpected family emergency discussed in detail with
8 counsel for Defendant and in light of the fact that the Court recently extended the settlement conference
9 to February 20, 2025. Defendant’s counsel agreed to the requested extension. The parties also agreed
10 to extend the CNLV’s reply deadline due to the upcoming holidays and the parties agreed to a one
11 month extension of the reply deadline until January 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 extension.
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18 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the
19 deadline for Mr. Calleros to respond to Defendant’s Motion for Summary Judgment filed on August
20 28, 2024 [ECF No. 44] from the current deadline of November 25, 2024 to December 16, 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 16, 2024 up to and including January 16, 2025.

3 DATED this 25th 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)
10 1925 Village Center Circle, Suite 150
11 Las Vegas, NV 89134
12 Tel.: (702) 362-8500

13 *Attorney for Plaintiff Augustine Calleros, Jr.*

5 Respectfully submitted,

6 NORTH LAS VEGAS CITY ATTORNEY

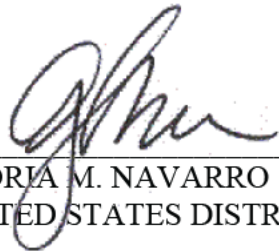
7 /s/ Madison Zornes-Vela

8
9 Madison Zornes-Vela, Esq. (NV Bar No. 13626)
10 2250 Las Vegas Blvd., N., Suite 810
11 North Las Vegas, Nevada 89030
12 Tel: (702) 633-1057

13 *Attorney for Defendant City of North Las Vegas*

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15 IT IS SO ORDERED:

16 *IT IS FURTHER ORDERED that this Order*
17 *granting Parties' Stipulation to Extend Deadlines*
18 *is the last extension the Court will grant*
19 *regarding the response and reply deadlines to*
20 *Defendant's Motion for Summary Judgment.*

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17 GLORIA M. NAVARRO
18 UNITED STATES DISTRICT JUDGE

19 Dated: November 26, 2024.