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11 *of America and Safeco Insurance*
12 *Company of Illinois*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 NILE LEATHAM, and THE ESTATE OF
16 MARIE LEATHAM-DAVIS,

17 Plaintiffs,

18 v.

19 SAFECO INSURANCE COMPANY OF
20 AMERICA, a foreign entity; SAFECO
21 INSURANCE COMPANY OF ILLINOIS, a
22 foreign entity; DOES I through X, inclusive; and
23 ROE CORPORATIONS I through V, inclusive,

24 Defendants.

CASE NO.: 2:23-cv-01432-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO FILE AND SERVE REPLY IN
SUPPORT OF THEIR MOTION FOR
SUMMARY JUDGMENT**

(Third Request)¹

25 Plaintiffs NILE LEATHAM (“Nile”), and THE ESTATE OF MARIE LEATHAM (the
26 “Estate”) (collectively “Plaintiffs”), and Defendants SAFECO INSURANCE COMPANY OF
27 ILLINOIS (“SICI”) and SAFECO INSURANCE COMPANY OF AMERICA (“SICA”)
28 (collectively “Safeco,” and with collectively with Plaintiffs, the “Parties”) hereby stipulate to allow
Safeco an extension of ten (10) days in which to file and serve its Reply in Support of its Motion
for Summary Judgment. (ECF No. 29). The reasons supporting this stipulation are as follows:
Defendants’ counsel has been inundated with a deluge of emergency filings in other matters, all of
which were unexpected. In light of the unexpected volume of the filings in other matters,

¹ This is the third request for an extension of briefing deadlines as a whole (ECF Nos. 31 and 35), but the first specifically related to Defendants’ Reply.

1 Defendants' counsel requires additional time to confer with their clients in preparation for their
2 Reply in order to prepare a complete Reply without the need for supplemental briefing (which is
3 discouraged). Finally, Defendants request a ten (10) day extension due to the intervening
4 Thanksgiving Holiday wherein conferral with clients is not expected to be practicable. Defendants
5 anticipate no further extensions needed.

6 With this extension, Defendants' Reply deadline would be extended from November 25,
7 2024, to December 5, 2024, again accounting for the intervening Thanksgiving Weekend. This is
8 the third extension of time requested by the Parties related to this Motion as a whole (ECF Nos. 31
9 and 35).

10 IT IS STIPULATED AND AGREED by and between the parties that Defendants shall have
11 up to and including December 5, 2024 to file their reply.

12 Dated: November 19, 2024

13 BOWEN LAW OFFICES

CLYDE & CO US LLP

14 By: /s/ Jerome R. Bowen

By: /s/ Lee H. Gorlin

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18 *Attorneys for Plaintiffs*

Attorneys for Defendants

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21 **ORDER**

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24 IT IS SO ORDERED:

25 DATED: November 22, 2024
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UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

As an employee of Clyde & Co US LLP, I certify that a copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO FILE AND SERVE REPLY IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT (Third Request)** was served by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court’s Registered Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: November 19, 2024

/s/ Debbie Shuta
An Employee of Clyde & Co US LLP