DEVERIE J. CHRISTENSEN, ESQ. 1 Nevada State Bar No. 6596 2 KIRSTEN A. MILTON, ESQ. Nevada State Bar No. 14401 3 JACKSON LEWIS P.C. 300 S. Fourth Street, Suite 900 4 Las Vegas, Nevada 89101 Tel: (702) 921-2460 5 Fax: (702) 921-2461 6 Email: Deverie.Christensen@jacksonlewis.com Email: Kirsten.Milton@jacksonlewis.com 7 Attorneys for Defendants Wood Residential, LLC, Wood Partners, LLC, and Wood Real Estate Investors, LLC 9 10 UNITED STATES DISTRICT COURT 11 DISTRICT OF NEVADA 12 Case No. 2:24-cv-00419-ART-BNW VANESSA NELSON 13 Plaintiff. STIPULATION TO EXTEND THE 14 DEADLINE FOR DEFENDANTS TO VS. **RESPOND TO PLAINTIFF'S** 15 AMENDED COMPLAINT, AND FOR WOOD RESIDENTIAL, LLC: WOOD THE PARTIES TO CONDUCT THE 16 FRCP 26(f) CONFERENCE AND PARTNERS, LLC; WOOD REAL ESTATE SUBMIT A PROPOSED DISCOVERY INVESTORS, LLC; and DOES 1-50, 17 PLAN AND SCHEDULING ORDER inclusive. 18 (First Request) Defendants. 19 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, 20 to extend the current deadline, May 31, 2024, one week to June 7, 2024, for Defendants to file 21 responses to Plaintiff's Amended Complaint, and for the parties to complete the FRCP 26(f) 22 conference and file a proposed Discovery Plan and Scheduling Order. 23 1. The deadline for Defendants to file responses to the Amended Complaint and to 24 complete the FRCP 26(f) and submit a Proposed Discovery Plan and Scheduling Order to the Court 25 is Friday, May 31, 2024. 26 2. Defendants planned to file responses to the Amended Complaint on May 31, and the 27 parties planned to complete the FRCP 26(f) conference this week and submit the proposed 28 Discovery Plan and Scheduling Order timely by May 31.

- 1		
1	3. Unfortunately, undersigned Defense Counsel had an unexpected medical emergency	
2	- she broke her foot and is out of the office this week due to the injury and pain. Thus, Defense	
3	Counsel has been unable to meet the current May 31 deadlines.	
4	4. However, Defense Counsel will be able to conduct the FRCP 26(f) conference	
5	(remotely) with Plaintiff's counsel next week, and the parties will be able to file the proposed	
6	Discovery Plan and Scheduling Order by Friday, June 7, 2024. Defense Counsel also will be able	
7	to file Defendants' responses to the Amended Complaint by June 7, 2024.	
8	5. Thus, the parties hereby stipulate to extend the deadline to June 7, 2024, for	
9	Defendants to file responses to the Amended Complaint, and for the Parties to complete the FRCP	
10	26(f) conference and file the proposed Discovery Plan and Scheduling Order.	
11	6. Since the Court's Stay was lifted on May 28, 2024 (ECF No. 23), this is the first	
12	request to extend the deadline for Defendant to file responses to Plaintiff's Amended Complaint	
13	and for the Parties to complete the FRCP 26(f) conference and file the proposed Discovery Plan	
14	and Scheduling Order. This request is made in good faith and not for the purpose of delay.	
15	Dated this 31st day of May, 2024.	
16	RAFII & ASSOCIATES, P.C.	JACKSON LEWIS P.C.
17	/s/ Jason Kuller	/s/ Deverie J. Christensen
18	Jason Kuller, Esq., Bar No. 1224 Shay Degenan, Esq., Bar No. 16397	Deverie J. Christensen, Esq., Bar No. 6596 Kirsten A. Milton, Esq., Bar No. 14401
19	1120 N. Town Center Drive, Suite 130 Las Vegas, Nevada 89144	300 S. Fourth Street, Suite 900 Las Vegas, Nevada 89101
20	Attorneys for Plaintiff	Attorneys for Defendants
21	<u>ORDER</u>	
22	IT IS HEREBY ORDERED that the deadline for Defendants to file responses to Plaintiff's	
23	Amended Complaint and for the Parties to complete the FRCP 26(f) conference and file a proposed	
24	Discovery Plan and Scheduling Order is continued to Friday, June 7, 2024.	
25	Dated this 3 day of June, 2024.	
26		
27	United States District Court/Magistrate Judge	

28