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12 \*Admitted pro hac vice

13 UNITED STATES DISTRICT COURT  
 14 DISTRICT OF NEVADA

15 REPUBLICAN NATIONAL COMMITTEE,  
 NEVADA REPUBLICAN PARTY, and SCOTT  
 16 JOHNSTON,

17 Plaintiffs,

18 v.

19 FRANCISCO AGUILAR, *in his official capacity as*  
*Nevada Secretary of State*; LORENA PORTILLO, *in*  
 20 *her official capacity as the Registrar of Voters for Clark*  
 County; WILLIAM "SCOTT" HOEN, AMY  
 21 BURGANS, STACI LINDBERG, and JIM  
 HINDLE, *in their official capacities as County Clerks,*

22 Defendants.

No. 2:24-CV-00518

**STIPULATION AND  
 PROPOSED ORDER TO  
 EXTEND DEADLINE  
 TO FILE DISCOVERY  
 PLAN**

**FIRST REQUEST**

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1 This is the first stipulation for an extension of time to file the stipulated discovery  
2 plan and scheduling order. Plaintiffs (the Republican National Committee, Nevada  
3 Republican Party, and Scott Johnston) and Defendants (Francisco Aguilar; Lorena  
4 Portillo; William “Scott” Hoen; Amy Burgans; Staci Lindberg; and Jim Hindle) stipulate  
5 as follows:

6 1. On April 15, 2024, Defendant Francisco Aguilar filed his Motion to  
7 Dismiss, Doc. 26. The other defendants joined the motion. *See* Docs. 27, 28, 30, 31, 38.

8 2. The current deadline for the parties to submit a stipulated discovery plan  
9 and scheduling order is May 30, 2024. *See* Doc. 26; LR 26-1.

10 3. Over the last several weeks, the parties have been conferring over several  
11 scheduling issues, including a possible motion to stay discovery in this case pending the  
12 Court’s resolution of the motion to dismiss.

13 4. The parties are nearing agreement on these scheduling issues, and  
14 respectfully request an additional two weeks to come to an agreement that they can  
15 present to the Court.

16 5. Therefore, the parties have agreed to set June 13, 2024, as the deadline for  
17 filing the stipulated discovery plan and scheduling order.

18 6. The parties submit this stipulation in good faith and without any intent to  
19 cause undue delay in this case.

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1 Dated: May 30, 2024

Respectfully submitted,

2 /s/ Laena St-Jules

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10 /s/ Benjamin R. Johnson

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18 /s/ Stephen B. Rye

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24 *Counsel for Defendant Staci Lindberg*

25 /s/ Katherine F. Parks

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*Counsel for Defendant Lorena Portillo*

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/s/ Cynthia Gregory  
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**ORDER**

**IT IS SO ORDERED.**



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Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

DATED: 6/4/2024