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7
8 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 UNDRA STEPHENS, Individually,
10 Plaintiff,
11 v.

12 JOHN ROBERT SKINNER, Individually;
DOE RENTER, an Individual; EAN
13 HOLDINGS, LLC, a Foreign-Limited
Liability Company; ENTERPRISE
14 LEASING COMPANY – WEST, LLC, a
Foreign Limited Liability Company;
15 UNITED STATES OF AMERICA;
DEPARTMENT OF THE AIR FORCE;
16 NELLIS AIR FORCE BASE; DOES I-XX;
Inclusive; and ROE CORPORATIONS I-XX,
Inclusive;

17 Defendants.
18

Case No. 2:24-cv-01700-RFB-DJA

**Stipulation and Order to Extend Time to
File a Response**

(Third Request)

19 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
20 this Court's Local Rules, Plaintiff and Federal Defendant United States of America, for itself
21 and on behalf of the Department of the Air Force, Nellis Air Force Base, and John Robert
22 Skinner, a defendant herein who was acting within the course and scope of federal
23 employment or office at the time of the subject incident ("Federal Defendants"), through
24 undersigned counsel, hereby stipulate and agree as follows:

25 Plaintiff filed his state court complaint in the Eighth Judicial District Court of Nevada
26 on June 18, 2024. ECF No. 3, p. 2, ¶ 5.

27 Plaintiff served Federal Defendants with a copy of the state court summons and
28 complaint on August 23, 2024. ECF No. 3, pp. 1-2, ¶¶ 1-2.

1 Federal Defendants removed the state court case on September 12, 2024. ECF No. 1.

2 On September 30, 2024, counsel for Plaintiff and Federal Defendants agreed to a 90-
3 day extension of time from September 30, 2024, for Federal Defendants to retrieve the
4 information needed to review and to respond to the allegations in Plaintiff's complaint. Since
5 the time the last stipulation was filed and approved by the Court, the parties have discussed
6 on numerous occasions potential issues regarding the submission of an SF 95 Form by
7 Plaintiff. Based on these discussions and the need for additional time to investigate these
8 issues Plaintiff and Federal Defendants agreed to an additional 30-day extension of time from
9 December 30, 2024, to January 31, 2025, to retrieve additional information regarding the
10 submission of an SF 95 Form and to respond to the allegations in Plaintiff's complaint. On
11 January 29, 2025, counsel for the Plaintiff and Defendants discussed procedural issues with
12 the lack of submission of SF 95 Form by the Plaintiff to the Agency regarding Plaintiff's
13 claims pursuant to 28 U.S.C. § 2675 and have agreed to an additional 45-day extension of
14 time from **January 31, 2025**, to **March 17, 2025**, for Federal Defendants to file a responsive
15 pleading to Plaintiff's complaint. This is the third request for an extension of time.

16 This stipulated request is filed in good faith and not for the purposes of undue delay.

17 Respectfully submitted this 30th day of January 2025.

18 DENTON CHO

SUE FAHAMI

Acting United States Attorney

19 /s/ Marianne Y. Denton

/s/ Virginia T. Tomova

20 MARIANNE Y. DENTON, ESQ.

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Las Vegas, NV 89101

Attorneys for the Federal Defendants

23 *Attorneys for Plaintiff*

24
25 IT IS SO ORDERED:

26 

27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 2/3/2025