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

14 UNDRA STEPHENS, Individually,

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

16 Plaintiff,
17 v.

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

19 **(Third Request)**

20 JOHN ROBERT SKINNER, Individually;
21 DOE RENTER, an Individual; EAN
22 HOLDINGS, LLC, a Foreign-Limited
23 Liability Company; ENTERPRISE
24 LEASING COMPANY - WEST, LLC, a
Foreign Limited Liability Company;
UNITED STATES OF AMERICA;
DEPARTMENT OF THE AIR FORCE;
NELLIS AIR FORCE BASE; DOES I-XX;
Inclusive; and ROE CORPORATIONS I-XX,
Inclusive;

25 Defendants.

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

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

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

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

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

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

Respectfully submitted this 30th day of January 2025.

DENTON CHO

SUE FAHAMI
Acting United States Attorney

/s/ Marianne Y. Denton
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/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney

Attorneys for Plaintiff

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 2/3/2025