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

10 Lelend Naehu; and K.N., a minor, by and
11 through her Guardian Ashlee Naehu,

12 Plaintiffs,

13 v.

14 Jamar Lakeith Glasper, an individual;
United States of America, through the
15 United States Postal Service, an agency of
the Government of the United States of
16 America, DOES 1 through 10, inclusive; and
ROE Business Entities 1 through 10
17 inclusive,

18 Defendants.

Case No. 2:24-cv-01705-CDS-BNW

**Stipulation to Extend United States'
Deadline to File Response to Plaintiff's
Complaint**

(First Request)

19 Plaintiff, Ashlee Naehu, through counsel and the United States of America on
20 behalf of Federal Defendants, through undersigned counsel, hereby stipulate and agree as
21 follows:

22 1. Plaintiff filed the Complaint on September 12, 2024 (ECF No. 1-1).

23 2. Plaintiff served the United States with a copy of the Summons and
24 Complaint on September 30, 2024.

25 3. The current deadline for the United States to respond to the Plaintiff's
26 Complaint is November 29, 2024.

1 Plaintiff and the United States, through undersigned counsel, agree and stipulate
2 that the United States' time to respond to the Plaintiff's Complaint shall be extended to
3 December 18, 2024.

4 The extension of time is necessary for the United States' counsel to obtain and
5 review the relevant information relating to the alleged traffic incident from the United
6 States Postal Service to properly respond to the allegations in Plaintiff's complaint.

7 Therefore, the parties request that the Court extend the deadline for the United
8 States to file a responsive pleading to Plaintiff's Complaint to December 18, 2024.

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

10 Respectfully submitted this 22nd day of November 2024

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ Ralph A. Schwartz
14 RALPH A. SCHWARTZ, ESQ.
14 400 South Seventh Street, Suite 100
14 Las Vegas, Nevada 89101

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney

Attorneys for the United States

15 *Attorney for Plaintiff*

17 **IT IS SO ORDERED:**

18
19 
20 **UNITED STATES MAGISTRATE JUDGE**

21 **DATED:** 11/25/2024