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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

20 TERRY CHI

Plaintiff

22 | v

23 CLARK COUNTY SCHOOL DISTRICT,
24 MARY "MARE" MAZUR, in her official
capacity and in her individual capacity; CEDRIC
25 COLE, in his official capacity and in his
individual capacity; JESUS JARA,
26 in his official capacity; BRENDA LARSEN-
MITCHELL, in her official capacity; and
27 SOUTHERN NEVADA PUBLIC
TELEVISION

Defendants

Case No.: 2:24-cv-02014-CDS-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
FILE HER OPPOSITION TO THE
FOLLOWING MOTIONS TO
DISMISS:**

(1) DEFENDANTS CLARK COUNTY SCHOOL DISTRICT, MARY “MARE” MAZUR, CEDRIC COLE, JESUS JARA, AND BRENDA LARSEN-MITCHELL’S PARTIAL MOTION TO DISMISS [ECF No. 22]; and (2) DEFENDANT SOUTHERN NEVADA PUBLIC TELEVISION’S MOTION TO DISMISS [ECF No. 24] (SECOND REQUEST)

[ECF No. 36]

1 Plaintiff TERRY CHI, by and through her attorney Robert P. Spretnak, Esq.; Defendants
2 CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada; MARY
3 “MARE” MAZUR, in her official capacity and in her individual capacity; CEDRIC COLE, in his
4 official capacity and in his individual capacity; JESUS JARA, in his official capacity; and
5 BRENDA LARSEN-MITCHELL, in her official capacity, by and through their attorneys Ethan D.
6 Thomas, Esq., Diana G. Dickinson, Esq., and Luke W. Molleck, Esq.; and Defendant SOUTHERN
7 NEVADA PUBLIC TELEVISION, a Nevada nonprofit corporation, by and through its attorneys
8 Rusty Graf, Esq., and Paul E. Larsen, Esq.; do hereby stipulate and agree to extend the deadline for
9 Plaintiff TERRY CHI to file her points and authorities in opposition to the following motions to
10 dismiss: (1) Defendants Clark County School District, Mary “Mare” Mazur, Cedric Cole, Jesus Jara,
11 and Brenda Larsen-Mitchell’s Partial Motion To Dismiss [ECF No. 22]; and (2) Defendant Southern
12 Nevada Public Television’s Motion To Dismiss [ECF No. 24] for an additional 17 days, to **March**
13 **17, 2025**. This is the second request to extend the time for filing points and authorities in opposition
14 to these motions to dismiss. The first motion to dismiss, ECF No. 22, was filed on January 10, 2025,
15 and, therefore, pursuant to LR 7-2(b), the original deadline for the opposition to that dispositive
16 motion was **January 24, 2025**. The second motion to dismiss, ECF No. 24, was filed on January
17 14, 2025, and, therefore, pursuant to LR 7-2(b), the original deadline for the opposition to that
18 dispositive motion was **January 28, 2025**. By prior Stipulation and Order, as approved by this
19 Court, ECF No. 28, these deadlines were extended to **February 28, 2025**.

20 There is good cause for this additional extension.

21 In the period of since the original deadlines for filing these motions, the schedule for the
22 attorney for Ms. Chi has been completely filled. Ms. Chi’s attorney is a solo practitioner. He was
23 on a scheduled vacation, outside the United States, from January 28, 2025, to February 11, 2025.
24 Upon his return two weeks ago, he prepared and filed oppositions to three dispositive motions in a
25 related case pending in the Clark County District Court, *Terry Chi v. Mary “Mare” Mazur, an*
26 *individual; Debra Solt, an individual; Douglas Bradford, an individual; Michele Kane, an*

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1 *individual; and Sun City Anthem Community Association, Inc., a Nevada non-profit corporation,*
2 Case No. A-24-901963-C. He also attended a deposition in another matter. He has to prepare Early
3 Neutral Evaluation settlement conference statements in two matters pending before this Court,
4 including this case. He has to prepare initial disclosures in this matter prior to the upcoming
5 settlement, which will involve the review and processing of a substantial amount of documentation
6 as part of that process. Thus, counsel has maintained a very full schedule in the period of time
7 covered by the first extension request.

8 Counsel is asking for an additional 17 days, to March 17, 2025, because he will be out of the
9 office the week of March 3, 2025. The following week, the week of March 10, 2025, counsel has
10 two settlement conferences and another settlement conference statement due.

11 The length of time for the extension is further necessitated by the fact that counsel for Ms.
12 Chi is scheduled to be on vacation, out of the country, from January 28, 2025, to February 11, 2025,
13 for a trip that has been postponed once and cannot be postponed or cancelled without incurring a
14 substantial expense.

15 Therefore, for the reasons set forth above, Plaintiff Terry Chi asks for an extension of time
16 to file her points and authorities in opposition to the two pending motions to dismiss in this matter
17 before this Court.

18 Moreover, the parties further stipulate that defendants shall have an additional two weeks to
19 file their respective reply briefs. This is necessitated by the complexity of this matter, specifically
20 in terms of the number of claims at issue, and due to the work schedules of the counsels of record
21 for the defendants. Under LR 7-2(b), reply briefs ordinarily would be seven days after the filing of
22 an opposition brief. In light of the aforementioned extension for Plaintiff Terry Chi to file her points
23 and authorities in opposition to the two pending motions to dismiss, any reply brief in support of
24 either motion would be on March 24, 2025, by operation of LR 7-2(b).

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1 The parties agree that the defendants have until April 7, 2025, to file their respective reply
2 briefs in support of their motions to dismiss.

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4 DATED: February 27, 2025.

5 LAW OFFICES OF ROBERT P. SPRETNAK

6 By: /s/ Robert P. Spretnak
7 Robert P. Spretnak, Esq. (Bar No. 5135)

8 8275 S. Eastern Avenue, Suite 200
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10 Attorney for Plaintiff Terry Chi

11

12 DATED: February 27, 2025.

13 LITTLER MENDELSON, P.C.

14 By: /s/ Diana G. Dickinson
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16 Diana G. Dickinson, Esq. (Bar No. 13477)
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20 Attorneys for Defendants Clark County School
21 District, Mary "Mare" Mazur, Cedric Cole,
22 Jesus Jara, and Brenda Larsen-Mitchell

23 DATED: February 27, 2025.

24 By: /s/ Paul E. Larsen
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26 Paul E. Larsen, Esq. (Bar No. 3756)

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29 Attorneys for Defendant Southern Nevada
30 Public Television

31 IT IS SO ORDERED.

32 UNITED STATES DISTRICT JUDGE

33 DATED: March 3, 2025