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12 Attorneys for Defendant JACK JUAN

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 JACQUELINE NICHOLS, individually,

16 Plaintiff,  
17 vs.

18 JACK JUAN, an individual; DOES I through  
19 X; ROE Corporations I through X, inclusive,

20 Defendants.

21 Case No. 2:25-cv-00120-GMN-NJK

22 **STIPULATION AND PROPOSED ORDER  
23 TO EXTEND TIME TO RESPOND TO  
PLAINTIFF JACQUELINE NICHOLS'S  
FIRST AMENDED COMPLAINT (FIRST  
REQUEST)**

24 Plaintiff JACQUELINE NICHOLS, by and through her attorneys of record, Margaret A. McLetchie and Leo S. Wolpert of McLETCHIE LAW, and Defendant JACK JUAN, by and through his attorneys of record, Ellen J. Winograd and Philip J. Tacason of LEWIS BRISBOIS BISGAARD & SMITH LLP (collectively "the Parties"), submit the following STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF JACQUELINE NICHOLS'S FIRST AMENDED COMPLAINT (FIRST REQUEST). The Parties stipulate to extend the time within which Defendant may respond to Plaintiff's First Amended Complaint by 21 days.

25 The parties seek this extension of time because Defendant's lead counsel had a series of  
26 medical incidents, beginning February 19, 2025. Counsel was travelling out-of-state. See LR IA  
27 6-1(a) (providing that a request to extend time "must state the reasons for the extension  
28 requested."). Should the Court require further information on Defendant's counsel's medical condition, counsel will submit additional information and documentation to the Court *in camera*.

1 Plaintiff requires further time to respond to any motion to dismiss because lead counsel  
2 for Plaintiff has an evidentiary hearing March 24-March 28, 2025, and will be preparing for the  
3 same March 17-March 23, 2-25. Further, lead counsel for Plaintiff has oral argument at the  
4 Nevada Supreme Court April 8, 2025.

5 **A. Proposed deadline to respond to First Amended Complaint.**

6 <b>Event</b>	7 <b>Current</b>	8 <b>Proposed New Deadline</b>
9 Deadline to Respond to 10 First Amended Complaint	11 March 11, 2025	12 <i>March 18, 2025</i>
13 Deadline to Reply to 14 Motion to Dismiss 15 Amended Complaint	16	17 <i>If the Court grants the extension as to 18 Defendant Juan's deadline, LR 7-2 provides 14 19 days within which to respond to a 20 motion. Thus, if Defendant were to file a Rule 21 12 motion on March 18, Plaintiff's response 22 would be due on April 1, 2025.</i>
		<i>The Parties stipulate that the deadline for Plaintiff's Response will be moved to April 15, 2025<sup>1</sup></i>

14 IT IS SO STIPULATED.

15 MCLETCHIE LAW

16 DATED this 10th, March, 2025.

17 By: /s/ Margaret A. McLetchie

18 Margaret A. McLetchie, Esq.

19 Leo S. Wolpert, Esq.

20 McLETCHIE LAW

21 602 South Tenth Street

22 Las Vegas, Nevada 89101

23  
24 *Attorneys for Plaintiff JACQUELINE  
25 NICHOLS*

26 LEWIS BRISBOIS BISGAARD & SMITH LLP

27 DATED this 10th, March, 2025.

28 By: /s/ Ellen Jean Winograd

29 Ellen Jean Winograd, Esq.

30 Philip J. Tacason, Esq.

31 LEWIS BRISBOIS BISGAARD & SMITH LLP

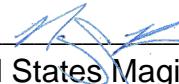
32 5555 Kietzke Lane, Suite 200

33 Reno, Nevada 89511

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35 *Attorneys for Defendant JACK JUAN*

36 **ORDER**

37 **IT IS SO ORDERED.**

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39   
40 United States Magistrate Judge  
41 Dated: March 11, 2025

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