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7 Attorneys for Defendant JACK JUAN

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 JACQUELINE NICHOLS, individually,
 11 Plaintiff,
 12 vs.
 13 JACK JUAN, an individual; DOES I through
 X; ROE Corporations I through X, inclusive,
 14 Defendants.

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

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

15
 16 Plaintiff JACQUELINE NICHOLS, by and through her attorneys of record, Margaret A.
 17 McLetchie and Leo S. Wolpert of McLETCHIE LAW, and Defendant JACK JUAN, by and
 18 through his attorneys of record, Ellen J. Winograd and Philip J. Tacason of LEWIS BRISBOIS
 19 BISGAARD & SMITH LLP (collectively “the Parties”), submit the following STIPULATION
 20 AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF
 21 JACQUELINE NICHOLS’S FIRST AMENDED COMPLAINT (FIRST REQUEST). The
 22 Parties stipulate to extend the time within which Defendant may respond to Plaintiff’s First
 23 Amended Complaint by 21 days.

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

| Event | Current | Proposed New Deadline |
|--|----------------|--|
| Deadline to Respond to First Amended Complaint | March 11, 2025 | March 18, 2025 |
| Deadline to Reply to Motion to Dismiss Amended Complaint | | <p><i>If the Court grants the extension as to Defendant Juan’s deadline, LR 7-2 provides 14 days within which to respond to a motion. Thus, if Defendant were to file a Rule 12 motion on March 18, Plaintiff’s response would be due on April 1, 2025.</i></p> <p><i>The Parties stipulate that the deadline for Plaintiff’s Response will be moved to April 15, 2025¹</i></p> |

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
 602 South Tenth Street
 Las Vegas, Nevada 89101


LEWIS BRISBOIS BISGAARD & SMITH LLP
 DATED this 10th, March, 2025.
 By: /s/ Ellen Jean Winograd
 Ellen Jean Winograd, Esq.
 Philip J. Tacason, Esq.
 LEWIS BRISBOIS BISGAARD & SMITH LLP
 5555 Kietzke Lane, Suite 200
 Reno, Nevada 89511

21 *Attorneys for Plaintiff JACQUELINE*
 22 *NICHOLS*

Attorneys for Defendant JACK JUAN

23 **ORDER**

24 **IT IS SO ORDERED.**

25 
 26 United States Magistrate Judge
 Dated: March 11, 2025

27 ¹ Plaintiff’s position is that any motion to dismiss practice should be stayed until after the Court
 28 resolves Plaintiff’s Motion to Remand (ECF No. 7) in no small part to save on attorney’s fees and costs.