

1 Mary Frudden, Esq.
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6 maryfrudden@sbcglobal.net
7 On behalf of Plaintiffs
8 Jon E. Frudden as parent and
9 guardian of John Doe and Jon
10 E. Frudden as parent and guardian
11 of Jane Doe

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 JON E. FRUDDEN, as parent and guardian of
11 his minor children JOHN DOE and JANE
12 DOE,

12 Plaintiffs,

13 vs.

14 KAYANN PILLING, et al.

15 Defendants.

Case No.: 3:11-cv-00474-RCJ-WCG

**MOTION AND STIPULATION
FOR EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF REQUEST FOR
ATTORNEY'S FEES AND IN REPLY TO
DEFENDANTS' RESPONSE TO REQUEST
FOR ATTORNEY'S FEES ON APPEAL**

(First Request and Stipulation)

18 JON E. FRUDDEN, as parent and guardian of his minor children, JOHN DOE AND
19 JANE DOE, by and through his attorney, Mary Frudden, Esq., pursuant to LR IA 6-1 and 6-2,
20 hereby files the following Motion and Stipulation for Extension of Time to File Reply in Support
21 of Request for Attorney's Fees and in Reply to Defendants' Response to Request for Attorney's
22 Fees (First Request). The Request for Attorney's Fees on Appeal was initially **timely filed** with
23 the Ninth Circuit Court of Appeals in Frudden v. Pilling, No. 15-15448 on **January 17, 2018**
24 (Dkt. 54); (Doc. 104). The Ninth Circuit transferred the Request on January 29, 2018 (Dkt. 55);
25 (Doc. 102). By Minute Order dated January 29, 2018, the District Court sua sponte extended the
26 time for Defendants/Appellees (hereafter Defendants) to file a response to the fee motion until
27 February 12, 2018. Plaintiffs request an extension of time to file the Reply until **February 26,**
28 **2018** because Plaintiffs' counsel Mary Frudden is the chaperone for several soccer players

Motion and Stipulation for Extension of Time to File Reply in Support of Request for Attorney's Fees
and in Reply to Defendants' Response to Request for Attorney's Fees 1

1 scheduled to play in the Mayor's Cup International Showcase in Las Vegas, Nevada February
2 17-19, 2018 for the Reno Strikers boys' team and will be driving to Las Vegas with the players
3 on Friday February 16 and driving back to Reno on either Monday February 19 or Tuesday
4 February 20, 2018. Because of her commitment as a chaperone, Mary Frudden, Esq. will have
5 insufficient time to prepare the anticipated Reply. This Motion and Stipulation is entered into in
6 good faith and not for the purpose of delay.

7 Dated this 7th day of February, 2018.

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9 By: s/ Mary Frudden
10 MARY FRUDDEN, ESQ.
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13 Reno, NV 89501
14 Telephone: 775-324-7078
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16 On Behalf of Plaintiffs
17 Jon E. Frudden as parent and guardian
18 of John Doe and Jon E. Frudden as
19 parent and guardian of Jane Doe

By: s/ Sara Almo
SARA ALMO, ESQ.
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On Behalf of Defendants Washoe
County School District and Roy
Gomm Elementary School Parent-
Faculty Association, Inc.

20 IT IS SO ORDERED: 

United States District Judge

21 DATED: – February 8, 2018.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the foregoing document was filed electronically with the Clerk of the
3 Court and served upon the Defendants' counsel via the electronic filing system and the Notice of
4 Electronic Filing indicates service as follows:

5 Sara Almo at salmo@washoeschools.net
6 Counsel for Defendants Washoe County School District and Roy Gomm Elementary
7 School Parent-Faculty Association, Inc.
8

9 Dated this 7th day of February, 2018.

10
11 s/ Mary Frudden
12 Mary Frudden, Esq.
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