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10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 BARON BEMENT,
 13
 Plaintiff,
 14
 vs.
 15 THE STATE OF NEVADA DEPARTMENT
 OF CORRECTIONS,
 16
 Defendants.
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Case No. 3:12-cv-00475-MMD-WGC

STIPULATION AND ORDER TO
EXTEND JOINT PRETRIAL ORDER
DEADLINE (FIRST REQUEST)

18 Defendant, State of Nevada Department of Corrections (“NDOC”), by and through its
 19 attorneys, Aaron D. Ford, Attorney General for the State of Nevada, Kevin A. Pick, Senior
 20 Deputy Attorney General, and Cameron P. Vandenberg, Chief Deputy Attorney General, and
 21 Plaintiff, Baron Bement, by and through his counsel Brian R. Morris, Esq., hereby stipulate and
 22 agree that the current May 8, 2020, deadline to file the parties’ proposed joint pretrial order be
 23 extended until 30 days after the Court enters its decision on NDOC’s Motion for
 24 Reconsideration (ECF No. 117), which was filed on May 5, 2020.

25 NDOC’s Motion for Reconsideration asks this Court to reconsider the April 8, 2020,
 26 Order (ECF No. 116) denying summary judgment and instructing that this case proceed to trial.
 27 See ECF No. 117. As such, any order regarding NDOC’s Motion for Reconsideration will
 28 necessarily involve (and possibly impact) many of the required sections in the proposed joint

1 pretrial order, including the contested issues of law and fact, the necessary exhibits, the
2 necessary witnesses, and the length of the trial. As such, the parties agree that judicial economy
3 and good cause support extending the current deadline for the proposed joint pretrial order until
4 30 days after the Court rules on NDOC's Motion for Reconsideration.

5 Additionally, good cause also exists for this stipulated extension due to the fact that the
6 undersigned counsel for NDOC recently returned from 30 days of paternity leave ending on
7 April 24, 2020, and did not have the benefit of the full 30 day period to prepare the proposed
8 joint pretrial order, as set forth in the Court's April 8, 2020, Order. Furthermore, the ability of
9 the undersigned counsel for NDOC to prepare the proposed joint pretrial order has been
10 hindered by the current pandemic, including the Governor's stay at home order.

11 DATED this 6th day of May 2020.

12 AARON D. FORD
13 Attorney General

14 By: /s/ Kevin A. Pick
15 KEVIN A. PICK (Bar. No. 11683)
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21 **ORDER**

22 IT IS SO ORDERED.

23 DATED: May 6, 2020, 2020.

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26 UNITED STATES DISTRICT JUDGE
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