

1 Richard I. Dreitzer (Bar. No. 6626)  
 David S. Kahn (Bar No. 7038)  
 2 James T. Tucker (Bar No. 12507)  
 Wilson Elser Moskowitz Edelman & Dicker LLP  
 3 300 South 4th Street - 11th Floor  
 Las Vegas, NV 89101-6014  
 4 Telephone: (702) 727-1400  
 Facsimile: (702) 727-1401  
 5 Richard.Dreitzer@wilsonelser.com  
 David.Kahn@wilsonelser.com  
 6 James.Tucker@wilsonelser.com

7 Adam Paul Laxalt, Esq.  
 Attorney General  
 8 Theresa M. Haar (Bar No. 12158)  
 Senior Deputy Attorney General  
 9 555 E. Washington Ave. Ste. 3900  
 Las Vegas, NV 89101  
 10 thaar@ag.nv.gov  
 11 *Attorneys for Defendants The State of Nevada, ex rel.  
 its Department of Corrections*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 DONALD WALDEN JR, NATHAN  
 ECHEVERRIA, AARON DICUS, BRENT  
 15 EVERIST, TRAVIS ZUFELT, TIMOTHY  
 RIDENOUR, and DANIEL TRACY on behalf of  
 16 themselves and all others similarly situated,

17 Plaintiffs,

18 vs.

19 THE STATE OF NEVADA, *EX REL.* ITS  
 NEVADA DEPARTMENT OF CORRECTIONS,  
 20 and DOES 1-50,

21 Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR ENLARGEMENT  
 OF TIME FOR DEFENDANT TO  
 FILE REPLY IN SUPPORT OF  
 DEFENDANTS' MOTION TO  
 EXCLUDE ALL EVIDENCE FROM  
 PLAINTIFFS' EXPERTS, THE  
 EMPLOYMENT RESEARCH  
 CORPORATION, MALCOLM COHEN  
 AND LAURA STEINER**

(Second Request)

**AND ORDER THEREON**

22 Defendant, STATE OF NEVADA, *EX REL.* ITS DEPARTMENT OF CORRECTIONS  
 23 ("NDOC") and Plaintiffs, DONALD WALDEN, JR., NATHAN ECHEVERRIA, AARON DICUS,  
 24 BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR and DANIEL TRACY, on behalf  
 25 of themselves and all others similarly situated (collectively, "The Parties") by and through their  
 26 respective counsel of record, hereby stipulate and agree to extend the time for Defendant, NDOC to  
 27 file its Reply in Support of Motion to Exclude All Evidence From Plaintiffs' Experts, The  
 28

1 Employment Research Corporation, Malcolm Cohen and Laura Steiner (ECF No. 189) from  
2 September 5, 2018 up to and including September 12, 2018.

3 Defendant is requesting this extension due to counsels' professional commitments and  
4 existing workload.

5 This stipulation is made in good faith and is not for purpose of undue burden or delay.

6 IT IS SO STIPULATED.

7  
8 DATED: September 4, 2018.

DATED: September 4, 2018.

9 **WILSON ELSER MOSKOWITZ**  
10 **EDELMAN & DICKER LLP**

**THIERMAN BUCK, LLP**

11 BY: /s/Richard I. Dreitzer  
12 Richard I. Dreitzer (Nevada Bar. No. 6626)  
13 South 4th Street - 11th Floor  
14 Las Vegas, NV 89101-6014  
15 *Attorneys for Defendants, The State of*  
16 *Nevada, ex rel. is Department of*  
17 *Corrections*

BY: /s/ Leah L. Jones  
Mark R. Thierman (Nevada Bar No. 8285)  
Joshua D. Buck (Nevada Bar No. 12187)  
Leah L. Jones (Nevada Bar No. 13161)  
7287 Lakeside Drive  
Reno, NV 89511  
*Attorneys for Plaintiffs*

18 **ORDER**

19 **IT IS SO ORDERED.**

20 Dated this 5th day of September, 2018.

21 

22 UNITED STATES DISTRICT JUDGE