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THIERMAN BUCK LLP  
Mark R. Thierman, Nev. Bar No. 8285  
mark@thiermanbuck.com  
Joshua D. Buck, Nev. Bar No. 12187  
josh@thiermanbuck.com  
Leah L. Jones, Nev. Bar No. 13161  
leah@thiermanbuck.com  
7287 Lakeside Drive  
Reno, Nevada 89511  
Tel. (775) 284-1500  
Fax. (775) 703-5027

*Attorneys for Plaintiffs*

WILSON ELSEER MOSKOWITZ,  
EDEL MEN & DICKER LLP  
Sheri M. Thome, Esq., Nev. Bar No. 008657  
James T. Tucker, Esq., Nev Bar No. 012507  
Cara T. Laursen, Esq., Nev Bar No. 014563  
300 South Fourth Street, 11th Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 727-1400  
Facsimile: (702) 727-1401  
Sheri.Thome@wilsonelser.com  
James.Tucker@wilsonelser.com  
CaraT.Laursen@wilsonelser.com

*Attorneys for Defendant The State of Nevada,  
ex rel. its Department of Corrections*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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

Plaintiffs,

v.

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

Defendants.

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

**STIPULATION FOR ENLARGEMENT  
OF TIME FOR RESPONSIVE MOTIONS  
AND [PROPOSED] ORDER THEREON**

**(Second Request)**

Plaintiffs DONALD WALDEN JR., NATHAN ECHEVERRIA, AARON DICUS,  
BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR, and DANIEL TRACY on  
behalf of themselves and all other similarly situated, and Defendant STATE OF NEVADA, *EX.*  
*REL.* ITS DEPARTMENT OF CORRECTIONS (collectively “The Parties), by and through their  
respective counsel of record, hereby stipulate and agree to extend the time for both Parties to file  
their respective responsive pleadings as set forth below.

**THIERMAN BUCK LLP**  
7287 Lakeside Drive  
Reno, NV 89511  
(775) 284-1500 Fax (775) 703-5027  
Email info@thiermanbuck.com www.thiermanbuck.com

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7287 Lakeside Drive  
Reno, NV 89511  
(775) 284-1500 Fax (775) 703-5027  
Email info@thiermanbuck.com www.thiermanbuck.com

1 This stipulation is submitted in compliance with LR IA 6-1. The Parties are requesting  
2 these extension due to the volume of motions pending, the complexity and fact intensive nature  
3 of the responsive pleadings, counsels’ professional commitments, existing workload, and the  
4 continued challenges of working remotely due to the COVID-19 crisis, including slower  
5 connectivity, communications delays, and obtaining records necessary to the motions. Good  
6 cause exists for the requested extensions.<sup>1</sup>

7 Accordingly, the Parties further stipulate and agree to extend the deadlines as follows:

8 **1.** Plaintiffs’ Opposition to NDOC’s Motion to Exclude Evidence from Plaintiffs’  
9 Expert ERC (ECF No. 282) currently due 5/6/20 shall be extended one (1) week to on or before  
10 **Wednesday, May 13, 2020.** Defendant’s Reply In Support Of shall be due on or before  
11 **Wednesday, May 27, 2020.**

12 **2.** Plaintiffs’ Opposition to NDOC’s Motion for Summary Judgment on Sovereign  
13 Immunity (ECF No. 276) currently due 5/13/20 which shall remain unchanged. The Parties  
14 request that Defendant’s Reply In Support Of shall be due on or before **Wednesday, June 3,**  
15 **2020.**

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28 <sup>1</sup> The Court granted the Parties First Request for Extension of time on 4/13/20 at ECF No. 287.

