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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.

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

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

- Plaintiffs' Opposition to NDOC's Motion to Exclude Evidence from Plaintiffs' 1. Expert ERC (ECF No. 282) currently due 5/6/20 shall be extended one (1) week to on or before Wednesday, May 13, 2020. Defendant's Reply In Support Of shall be due on or before Wednesday, May 27, 2020.
- Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on Sovereign 2. Immunity (ECF No. 276) currently due 5/13/20 which shall remain unchanged. The Parties request that Defendant's Reply In Support Of shall be due on or before Wednesday, June 3, 2020.

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

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1	3. Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on the Merits	
2	of Plaintiffs FLSA Claims (ECF No. 283) currently due 5/20/20 which shall remain unchanged.	
3	The Parties request that Defendant's Reply In Support Of shall be due on or before	
4	Wednesday, June 10, 2020.	
5	The Parties agree that the requested extension furthers the interest of this litigation and is	
6	not being requested in bad faith or to delay these proceedings unnecessarily. IT IS SO STIPULATED.	
7		
8	II IS SO STILCENTED.	
9	Dated: May 5, 2020.	Dated: May 5, 2020.
10	THIERMAN BUCK LLP	WILSON ELSER MOSKOWITZ, EDELMEN & DICKER LLP
11		EDEEMEN & DICKER LEI
12	/s/Leah L. Jones	— /s/James T Tucker
13	Mark R. Thierman, Esq., Bar No. 8285 Joshua D. Buck, Esq., Bar No. 12187	Sheri M. Thome, Esq., Bar No. 008657 James T. Tucker, Esq., Bar No. 012507
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16	Fax. (775) 703-5027	Attorneys for Defendants
17	Attorneys for Plaintiffs	
18		
19		
20	ORDER	
21	IT IS SO ORDERED.	
22	Dated this 6th day of May, 2020.	
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U.S. District Judge