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2 Nevada Bar No. 645  
592 5<sup>th</sup> Street  
3 Elko, NV 89801  
(775) 738-2525  
4 Attorney for Plaintiff

5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

8 JAMES CORGAN,  
9 Plaintiff,

Case No: 3:14-cv-00692-RCJ-WGC

10 vs.

11 NEVADA DEPARTMENT OF PUBLIC SAFETY  
12 INVESTIGATION DIVISION; Detective BRAD  
WARWICK; Detective MIKE KEEMA; Sgt. KELLY  
13 STUEHLING; JIM PITTS - the Sheriff of Elko  
County and/or Any of His Subordinates;  
14 Undersheriff CLAIR MORRIS; Deputy in Charge  
of Jail MIKE SILVA; ELKO COUNTY DEPUTY  
15 SHERIFFS AND JAILERS; THE COUNTY OF  
ELKO, a Political Subdivision of the State of  
16 Nevada; Elko County Commissioner GLEN  
GUTTRY; Elko County Commissioner CHARLIE  
17 MYERS; Elko County Commissioner DEEMAR  
DAHL; Elko County Commissioner JEFF  
18 WILLIAMS; Elko County Commissioner  
WARREN RUSSELL; Inmate SERVANDO  
19 MUÑOZ CORTEZ (aka SERVANDO MUÑOZ-  
CORTEZ); Inmate BRYAN PAIGE; FRANCISCA  
20 BAUSTISTA (sp?) VILLANO; and JOHN/JANE  
DOES 1-10;

**STIPULATION TO ENLARGE THE  
TIME WITHIN WHICH TO FILE  
RESPONSIVE PLEADING TO  
MOTION TO DISMISS**

21 Defendants.  
22 \_\_\_\_\_ /

23 **STIPULATION TO ENLARGE THE TIME WITHIN WHICH TO FILE RESPONSIVE**  
24 **PLEADING TO MOTION TO DISMISS**

25 COMES NOW, Plaintiff JAMES CORGAN (herein "CORGAN"), by and through his  
26 attorney GREGORY D. CORN, ESQ., of the Law Offices of Gregory D. Corn Chartered, and  
27 Defendants Detective MIKE KEEMA; JIM PITTS - the Sheriff of Elko County and/or Any of

28  
GREGORY D. CORN CHARTERED  
A Professional Law Corporation  
592 5<sup>th</sup> St. - Elko, NV 89801  
775-738-2525 - Fax: 775-738-1950

1 His Subordinates; Undersheriff CLAIR MORRIS; Deputy in Charge of Jail MIKE SILVA;  
2 ELKO COUNTY DEPUTY SHERIFFS AND JAILERS; THE COUNTY OF ELKO, a Political  
3 Subdivision of the State of Nevada; Elko County Commissioner GLEN GUTTRY; Elko  
4 County Commissioner CHARLIE MYERS; Elko County Commissioner DEEMAR DAHL; Elko  
5 County Commissioner JEFF WILLIAMS; Elko County Commissioner WARREN RUSSELL  
6 (herein collectively "COUNTY OF ELKO"), by and through their attorney BRENT T.  
7 KOLVET, ESQ., of Thorndal Armstrong Delk Balkenbush & Eisenger, and makes this  
8 stipulation, as follows:

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- 10 1. The COUNTY OF ELKO has filed on January 22, 2015, a Motion to Dismiss (herein  
11 "Motion").
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  - 13 2. The time within which CORGAN must otherwise responsively plead to the Motion  
14 otherwise expires on February 5, 2015.
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  - 16 3. As CORGAN is in need of certain documents and/or pleadings not yet in his  
17 possession which are currently in possession of CORGAN's former Public Defender  
18 Criminal Law Attorney, the Cavanaugh-Bill Law Offices, CORGAN has caused to be  
19 delivered for execution an authorization for release of all said pleadings and/or  
20 documentation which authorization is necessary wherein CORGAN has waived any  
21 attorney-client privilege where JOHN STEVENSON, ESQ., formerly of the  
22 Cavanaugh-Bill Law Offices, is in need of the executed authorization in order that he  
23 may review the same and provide relevant information to CORGAN's attorney with  
24 respect to and in furtherance of CORGAN's Opposition to the COUNTY OF ELKO's  
25 Motion.
  - 26
  - 27 4. COUNTY OF ELKO stipulates and does not object to this Court entering it's order
  - 28

1 and/or documentation which include confidential information that CORGAN must have  
2 to file his Opposition, and in addition, obtain the Affidavit of his former criminal attorney  
3 JOHN STEVENSON, ESQ. in support of the CORGAN Opposition.  
4

5 6. CORGAN has filed on or around even date herewith his motion seeking the relief  
6 requested herein to enlarge the time within which CORGAN must file his Opposition to  
7 the Motion.  
8

9 IT IS SO STIPULATED:

10 ORDER

11 IT IS HEREBY ORDERED that the Stipulation to Enlarge the Time Within Which to File  
12 Responsive Pleading to motion to Dismiss (ECF #13) is GRANTED.

13 IT IS FURTHER ORDERED that the Motion to Enlarge the Time Within Which to File  
14 Responsive Pleading to Motion to Dismiss and Pursuant to Stipulation Agreeing to the  
15 Same (ECF #12) is GRANTED.

16 IT IS SO ORDERED this 30th day of January, 2015.

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19 ROBERT C. JONES  
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