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Attorneys for Plaintiffs and Counterclaim Defendants  
 Michael F. Reeder and Pamela O'Keefe,  
 Trustee for the Jordan Grace Reeder Irrevocable Trust  
 and Trustee for the Darby Leigh Reeder Irrevocable Trust

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA, NORTHERN DIVISION

MICHAEL F. REEDER,  
  
 Plaintiff,

v.

UNITED STATES OF AMERICA,  
 Defendant.

PAMELA M. O'KEEFE, as  
 Trustee for the JORDAN  
 GRACE REEDER  
 IRREVOCABLE TRUST,

Plaintiff,

v.

UNITED STATES OF  
 AMERICA,  
 Defendant.

Civil No.: 3:15-cv-00129-MMD  
 WGC

**SECOND JOINT STIPULATION  
 TO EXTEND THE BRIEFING  
 SCHEDULE FOR THE UNITED  
 STATES' MOTION FOR  
 SUMMARY JUDGMENT;  
 [PROPOSED] ORDER**

1 AND RELATED  
2 COUNTERCLAIMS

3 COMES now Plaintiffs and Counterclaim Defendants Michael F. Reeder  
4 (“Reeder”) and Pamela O’Keefe, as Trustee of the Jordan Grace Reeder  
5 Irrevocable Trust, dated April 15, 1993 (“JGR Trust”) and the Darby Leigh Reeder  
6 Irrevocable Trust (“DLR Trust”), Defendant and Counterclaimant, United States of  
7 America (“United States”), by and through their undersigned counsel, and submit a  
8 joint stipulation to extend the briefing dates with respect to the Motion for  
9 Summary Judgment which was refiled by the United States of America (“United  
10 States”) with this Court on April 15, 2019 [ECF 84].  
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13 The Motion for Summary Judgment was originally filed on May 1, 2018  
14 [ECF 65]. Meanwhile, Plaintiffs and Counterclaim Defendants submitted a global  
15 settlement offer to the government. Formal consideration of the offer by the  
16 government was ongoing until approximately April 15, 2019. Upon the tentative  
17 rejection of the global settlement offer, the government refiled its Motion for  
18 Summary Judgment in accordance with the Court’s Order of February 11, 2019  
19 [ECF 81].  
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23 Plaintiff’s counsel, together with Plaintiff, attended an in-person settlement  
24 conference with the supervisor whom has settlement authority in Washington D.C.  
25 on Thursday, May 16, 2019. The parties are optimistic that in principal a  
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1 settlement has been reached, but there are still some terms to be determined  
2 including reaching a workable payment plan. The proposed settlement will result  
3 in a joint motion for stipulation to judgment resolving this action in its entirety.  
4 Accordingly, the parties are hopeful that it will be not be necessary to further brief  
5 the government's Motion for Summary Judgment.  
6

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8 Based on the foregoing, the parties respectfully request an additional 60-day  
9 extension to the briefing schedule. The parties stipulate that the current briefing  
10 schedule dates be extended with the Opposition by the Plaintiff and Counter  
11 Defendant to the United States' Motion for Summary Judgment to be filed by  
12 August 12, 2019, and the United States' Reply Brief to be filed by September 12,  
13 2019. The Parties will immediately advise the Court when a full settlement is  
14 reached.  
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19 PANITZ & KOSSOFF, LLP  
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21 DATED: May 23, 2019

22 /s/Barbara E. Lubin  
23 BARBARA E. LUBIN  
24 PANITZ & KOSSOFF, LLP  
25 5743 Corsa Avenue, Suite 208  
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28 Attorneys for Plaintiffs and  
Counterclaim Defendants

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RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

DATED: May 23, 2019

/s/Henry C. Darmstadter  
HENRY C. DARMSTADTER  
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NICHOLAS A. TRUTANICH  
United States Attorney  
District of Nevada  
*Of Counsel*

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT  
JUDGE

DATED: May 23, 2019