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1 TERRI KEYSER-COOPER Law Office of Terri Keyser-Cooper 2 1130 Wakefield Trail Reno, NV 89523 3 Nevada Bar #3984 (775) 337-0323 4 Keysercooper@lawyer.com Attorney for Plaintiff Clifford Miller 5 6 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 CLIFFORD W. MILLER, Case No. 3:17-cv-00068-MMD-WGC 12 13 Plaintiff, STIPULATION AND ORDER FOR PLAINTIFF TO EXTEND TIME TO 14 REPLY TO DEFENDANT'S v. **OPPOSITION TO PLAINTIFF'S** 15 ROMEO ARANAS, et al. MOTION FOR LEAVE TO AMEND AND FOR DEFENDANTS TO 16 Defendants. **RESPOND TO DISCOVERY** 17 (First Request) 18 Plaintiff, Clifford W. Miller, by and through counsel, Terri Keyser-Cooper, and Defendant 19 Romeo Aranas and the Nevada Department of Corrections, by and through counsel Aaron D. Ford, 20 Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, 21 hereby stipulate and agree that the time for Plaintiff to file a Reply to Defendant's Opposition to 22 Plaintiff's Motion For Leave to Amend, ECF No. 61, shall be extended two weeks. The Reply is 23 currently due on April 6, 2020, the new deadline will be April 20, 2020. Defendants now have 24 outstanding discovery due to Plaintiff which is due on or about April 6th. The parties agree that 25 Defendants shall have up to and including April 20, 2020, to tender the discovery responses. 26 The purpose of the Stipulation is to allow the Plaintiff additional time as Plaintiff's counsel 27

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has two emergency motions that require immediate attention and a brief in another case which is 1 approaching the statute of limitations. Due to these time restrains and unexpected filings by 2 opposing counsel in other cases, and counsels' schedule, it will not be possible for the parties to 3 meet the current deadlines. Therefore the parties stipulate and request that the date for Plaintiff to 4 file his Reply will be April 20, 2020 and the date for Defendant to respond to discovery will be 5 April 20, 2020. This stipulation is entered into in good faith. 6 7 Dated this 31th day of March 2020 8 9 LAW OFFICE OF TERRI KEYSER-COOPER 10 By: /s/ Terri Keyser-Cooper TERRI KEYSER-COOPER 11 Attorney for Plaintiff Clifford Miller 12 13 By: /s/Terri Keyser-Cooper By: /s/ Douglas R. Rands 14 Terri Keyser-Cooper Douglas R. Rands Law Office of Terri Keyser-Cooper Senior Deputy Attorney General 15 1130 Wakefield Trail Attorneys for Defendants 16 Reno, NV 89523 Attorney for Plaintiff 17 18 IT IS SO ORDERED: 19 20 William G. Cobb U.S. MAGISTRATE JUDGE 21 **DATED:** April 1, 2020. 22 23 24 25 26 27

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