| 1 2 3 4 5 6 | Katherine F. Parks, Esq State Bar No. 6227 Thorndal Armstrong Delk Balkenbush & Eisinger 6590 S. McCarran Blvd., Suite B Reno, Nevada 89509 (775) 786-2882 kfp@thorndal.com Attorneys for Defendants DOUGLAS COUNTY, SCOTT SHICK, AND VICTORIA SAUER-LAMB | | |
|----------------------------|--|---|--|
| 7 | UNITED STATES DISTRICT COURT | | |
| 8 | DISTRICT OF NEVADA | | |
| 9 | | | |
| 10 | JOHN ENOS, an individual, | CASE NO. 3:17-cv-00095-MMD-VPC | |
| 11 | Plaintiff, | | |
| 12 | VS. | STIPULATION AND [PROPOSED] | |
| 13 | DOUGLAS COUNTY, a political subdivision of | ORDER TO EXTEND TIME TO FILE | |
| 14 | the State of Nevada; SCOTT SHICK, Chief | OPPOSITION TO MOTIONS FOR PARTIAL SMMARY JUDGMENT | |
| 15 | Juvenile Probation Officer of the Juvenile Probation Department; VICTORIA SAUER- | [ECF No. 106 and 107] | |
| 16 | LAMB, Supervisor of the Juvenile Probation Department; NATHAN TOD YOUNG, Judge of | | |
| 17 | the Ninth Judicial District Court of the State of | [Second Request] | |
| 18 | Nevada; MICHAEL GIBBONS, Former Judge of the Ninth Judicial District Court of Nevada; | | |
| 19 | THE STATE OF NEVADA ex rel. Nathan Todd | | |
| 20 | Young and Michael Gibbons; DOE GOVERNMENTAL ENTITIES 1-10; DOE | | |
| 21 | BUSINESS ENTITIES 1-10; and DOE INDIVIDUALS 4-50, | | |
| 22 | , | | |
| 23 | Defendants. | | |
| 24 | | | |
| 25 | COME NOW Defendants, DOUGLAS COUNTY, SCOTT SHICK, and VICTORIA | | |
| 26 | SAUER-LAMB, and Plaintiff, JOHN ENOS, by and through their attorneys of record, and | | |
| 27 | hereby request an extension of time for the parties to file their oppositions to the motions for | | |
| 28 | partial summary judgment [ECF No. 106 and ECF No. 107] filed on July 12, 2019. | | |
| I | I and the second | | |

| 1 | The oppositions are currently due on August 16, 2019, and the parties request an | | |
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| 2 | additional two week extension of time through and until August 30, 2019, to file their | | |
| 3 | oppositions to the motions for partial summary judgment. This is the parties' second request to | | |
| 4 | extend said deadline. The parties submit that this second request is not for the purpose of undue | | |
| 5 | delay but is related to caseload and calendaring issues, as well as staffing issues recently | | |
| 6 | experienced by the law firm for counsel for the Defendants. | | |
| 7 | DATED this 12 th day of August, 2019. | DATED this 12 th day of August, 2019. | |
| 8 | THE GEDDES LAW FIRM, P.C. | THORNDAL ARMSTRONG DELK | |
| 9 | | BALKENBUSH & EISINGER | |
| 10 | By: / s / William Geddes | By: / s / Katherine F. Parks | |
| 11 | William J. Geddes, Esq. Kristen Geddes, Esq. | Katherine F. Parks, Esq. State Bar No. 6227 | |
| 12 | 8600 Technology Way, Suite 107 | 6590 S. McCarran Blvd., Suite B | |
| 13 | Reno, Nevada 89521 (775) 853-9455 | Reno, Nevada 89509 (775) 786-2882 | |
| 14 | | kfp@thorndal.com | |
| 15 | DATED this 12 th day of August, 2019. | Attorneys for Defendants DOUGLAS COUNTY, SCOTT SHICK, AND | |
| 16 | THE PALMER LAW FIRM, P.C. | VICTORIA SAUER-LAMB | |
| 17 | By: / s / Raelene K. Palmer, Esq. | | |
| 18 | Raelene K. Palmer, Esq. 5550 Painted Mirage Road, Suite 320 | | |
| 19 | Las Vegas, Nevada 89149 | | |
| 20 | (702) 952-9533 rpalmer@plflawyers.com | | |
| 21 | Attorneys for Plaintiff John Enos | | |
| 22 | Voin Enos | | |
| 23 | | | |
| 24 | <u>ORDER</u> | | |
| 25 | IT IS SO ORDERED. | | |
| 26 | DATED <u>August 13</u> , 2019. | | |

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DISTRICT COURT JUDGE