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12   **UNITED STATES DISTRICT COURT**

13   **DISTRICT OF NEVADA**

14 JOHN ENOS, an individual,   CASE NO: 3:17-cv-00095-MMD-CLB

15   Plaintiff,

16 vs.

17 DOUGLAS COUNTY, a political subdivision   **STIPULATION AND [PROPOSED]**
    of the State of Nevada; SCOTT SHICK, Chief   **ORDER TO ENLARGE TIME TO FILE**
18 Juvenile Probation Officer of the Juvenile   **PROPOSED JOINT PRETRIAL ORDER**
    Probation Department; *et al*.
19   (First Request)
                        Defendants.
20

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22   COMES NOW Plaintiff JOHN ENOS and Defendants DOUGLAS COUNTY, SCOTT SHICK,

23 and VICTORIA SAUER-LAMB, by and through their undersigned attorneys of record, and hereby

24 request a 30-day enlargement of time for the parties to file their proposed Joint Pretrial Order (JPTO).

    The proposed JPTO is currently due on Monday, April 20, 2020. At this time, the parties believe that

25 additional time, between 30-60 days, is necessary to submit the proposed JPTO; however, the parties'

26 first request is limited to requesting 30 additional days **through and including Wednesday, May 20,**

27 **2020** to file the proposed JPTO. The Coronavirus Disease (COVID-19) pandemic has impaired

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counsel's ability to prepare the JPTO. For example, one attorney for Plaintiff is located in Las Vegas, where COVID-19 case are much higher and would require out-of-town counsel to travel to Washoe County. As well, due to Governor Sisolak's social distancing guidelines and directives, other counsel have been subject to office closures and staff reductions, hindering counsel's ability to do work necessary to prepare the JPTO. Due to the same social distancing guidelines, there is also great uncertainty as to the availability of the parties, counsel, witnesses and potential jurors to interact at a trial. What's more, it is not known when normal Court operations will resume in light of the exigent circumstances and temporary restrictions regarding court operations imposed by Temporary General Order 2020-04. At the time of the issuance of Temporary General Order 2020-04 the Court noted there were 26 reported cases of COVID-19. *See generally*, Temporary General Order 2020-04, fn. 1. As of the present date of filing the instant Stipulation, the number of reported cases in Washoe County is 309, which continues to increase daily.[1] Since the issuance of Temporary General Order 2020-04, Governor Sisolak recently extended the closure of businesses and schools from April 16, 2020 until at least April 30, 2020.   While nationwide it has been reported that COVID-19 cases are expected to peak within the next week to ten days, recent reports concerning Washoe County have modelled the peak of COVID-19 cases in Washoe County as possibly coming near the end of May.[2] Consequently, it is unknown at this time when the Court will resume normal operations, including setting trials, which further frustrates the parties' attempts to arrive at good-faith representations of availability of trial counsel, the parties and witnesses for trial.

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[1] *See* https://www.rgj.com/story/news/2020/04/07/washoe-county-coronavirus-update-reno-las-vegas-nevada/2959245001/ (last accessed April 7, 2020).
[2] *See* fn. 1.

This is the parties' first request to extend this deadline, and the parties submit that this request is not for the purpose of undue delay.

Dated this 7th day of April 2019.

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By: _____

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Dated this 7th day of April 2020.

THORNDAL ARMSTRONG DELK
BALENBUSH & EISINGER

Electronic Signature Authorized

/s/

By: _____

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Attorneys for Defendants

II.

ORDER

IT IS SO ORDERED.

Dated: April 8, 2020 _____

_____
UNITED STATES DISTRICT JUDGE