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 5 Attorneys for Plaintiff John Enos

6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

8 JOHN ENOS, an individual,  
 9 Plaintiff,

CASE NO: 3:17-cv-00095-MMD-VPC

10 vs.

**STIPULATION AND PROPOSED ORDER  
 FOR ENLARGEMENT OF TIME**

11 DOUGLAS COUNTY, a political subdivision  
 of the State of Nevada; SCOTT SHICK, Chief  
 12 Juvenile Probation Officer of the Juvenile  
 Probation Department; THE STATE OF  
 13 NEVADA *ex rel.* The Ninth Judicial District  
 Court of the State of Nevada; DOE  
 14 GOVERNMENTAL ENTITIES 1-10, DOE  
 BUSINESS ENTITIES 1-10; and DOE  
 15 INDIVIDUALS 1-50.

**For Plaintiff to File Opposition  
 To Defendant State of Nevada's  
 Motion to Dismiss (ECF 005)**

**(Second Request)**

16 Defendants.  
 17

18 The parties to this action, by and through their undersigned counsel of record hereby stipulate  
 19 that Plaintiff may have a three (3)-day extension of time, **through and including Friday, June 9,**  
 20 **2017**, to file his opposition to *Defendant State of Nevada's Motion to Dismiss* (ECF 005). This is the  
 21 second request for such an extension. The current deadline to file this opposition is Tuesday, June 6,  
 22 2017. The reason Plaintiff needs additional time to file this brief is because his counsel has had a very  
 23 congested calendar, his counsel's office was closed on Memorial Day, and his counsel's legal work for  
 24 a wrongful-death litigation that has taken longer than his counsel originally anticipated when requesting  
 25 the first extension of this filing deadline. Accordingly, Plaintiff will need a few days' additional time to  
 26 file the opposition brief.

27 ///

28 ///

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 Phone 775-853-9455

1 This Stipulation is not offered for any dilatory or improper purpose.

2  
3 Dated this 1<sup>st</sup> day of June 2017.

Dated this 1<sup>st</sup> day of June 2017.

4 ADAM PAUL LAXALT  
5 Attorney General


THE GEDDES LAW FIRM, P.C.

6 *Electronic Signature Authorized*

7 Steve Shevorski

8 By: /s/

8 STEVE SHEVORSKI  
9 Nevada Bar No. 8256  
10 Head of Complex Litigation  
11 MICHELLE DI SILVESTRO ALANIS  
12 Nevada Bar No. 10024  
13 Deputy Attorney General  
14 State of Nevada  
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19 *Attorneys for State of Nevada*  
20 *ex rel. Ninth Judicial District Court*  
21 *of the State of Nevada*

  
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*Attorneys for Plaintiff John Enos*

16 **ORDER**

17 THE COURT, having considered the preceding *Stipulation* and GOOD CAUSE appearing  
18 therefor, GRANTS the *Stipulation*. IT IS HEREBY ORDERED that Plaintiff shall have additional  
19 time, **through and including Tuesday, June 9, 2017**, to file his opposition to *Defendant State of*  
20 *Nevada's Motion to Dismiss* (ECF 005).

21 Dated: June 1, 2017

IT IS SO ORDERED

22  
23  
24   
25 UNITED STATES DISTRICT JUDGE

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Reno, NV 89521  
Phone 775-853-9455

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **June 1, 2017**, I caused to be served a copy of the foregoing *Stipulation and Proposed Order for Enlargement of Time for Plaintiff to File Opposition to Defendant State of Nevada’s Motion to Dismiss (ECF 005)(Second Request)*, by electronic filing with the Court’s Pacer e-filing system, addressed to:

Adam Paul Laxalt  
Attorney General  
Steve Shevorski  
Nevada Bar No. 8256  
Head Of Complex Litigation  
Michelle Di Silvestro Alanis  
Nevada Bar No. 10024  
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ex rel. Ninth Judicial District Court of the State of Nevada

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WILLIAM J. GEDDES  
An employee of the Geddes Law Firm, P.C.