

1 **LAGOMARSINO LAW**
 2 ANDRE M. LAGOMARSINO, ESQ.
 3 3005 W. Horizon Ridge Pkwy., Suite 241
 4 Henderson, Nevada 89052
 Telephone: (702) 383-2864
 Facsimile: (702) 383-0065
aml@lagomarsinolaw.com
 Attorney for Plaintiff

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

7 LEWIS STEWART, an individual,
 8
 9 Plaintiff-Appellee

10 v.

11 ROMEO ARANAS; JAMES COX;
 12 FRANCISCO M. SANCHES; BRIAN E.
 WILLIAMS,

13 Defendants – Appellants,

14 and

15 CHERYL BURSON; S.L. CLARK; JAMES E.
 16 DZURENDA; ANGIE JONES; SEAN SU;
 17 STATE OF NEVADA

18 Defendants.

Case No.: 3:17-cv-00132-MMD-CLB

STIPULATION AND [PROPOSED]
ORDER TO EXTEND PLAINTIFF’S
DEADLINE TO FILE HIS REPLY TO
DEFENDANTS’ OPPOSITION TO
PLAINTIFF’S MOTION TO VACATE
THE STAY PENDING DEFENDANTS’
APPEAL AND REQUEST TO CERTIFY
DEFENDANTS’ APPEAL AS
FRIVOLOUS (ECF NO. 75)

(First Request)

19 WHEREAS Defendants Romeo Aranas, James Cox, Francisco Sanchez and Brian Williams
 20 collectively filed their opposition to Plaintiff’s Motion to Vacate the Stay Pending Defendants’
 21 Appeal and Request to Certify Defendants’ Appeal as Frivolous on July 15, 2020 (ECF No. 75).
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23 Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for
 24 plaintiff to file his reply to defendants’ opposition. The current deadline for plaintiff to reply to
 25 defendants’ opposition is **July 22, 2020**. The new deadline for plaintiff to reply to defendants’
 26 opposition will be **August 5, 2020**.

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1 Good cause exists because one (1) of plaintiff's associate attorneys has suddenly been
2 quarantined due to a possible exposure to COVID-19. As a firm of only three (3) attorneys, the
3 attorney that was tasked with drafting the reply brief has had to cover the caseload for the
4 quarantined attorney resulting in a delay to draft reply. This unexpected coverage includes coverage
5 for multiple depositions and deposition preparation during the seven (7) day period that would have
6 been otherwise allocated for the drafting of a reply brief.

7
8 This extension is the first request for an extension and is not submitted for the purpose of
9 delay.

10 **IT IS SO STIPULATED AND AGREED.**

11 DATED this 20th day of July, 2020.

DATED this 20th day of July, 2020.

12 **LAGOMARSINO LAW**

OFFICE OF THE ATTORNEY GENERAL

13 /s/ Andre M. Lagomarsino
14 Andre M. Lagomarsino, Esq. (#6711)
15 3005 W. Horizon Ridge Pkwy., #241
16 Henderson, Nevada 89052
Attorney for Plaintiff Lewis Stewart

/s/ FRANK TODDRE II
Frank Toddre II, Esq.
555 East Washington Avenue, Suite 3900
Las Vegas, Nevada 89101
*Attorney for Defendants Romeo Aranas, James
Cox, Francisco Sanchez and Brian Williams*

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18 **IT IS SO ORDERED.**



19 _____
20 UNITED STATES DISTRICT COURT JUDGE

21 DATED: July 21, 2020
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