

1 AARON D. FORD
 Attorney General
 2 STEPHEN J. AVILLO, Bar No. 11046
 Deputy Attorney General
 3 State of Nevada
 100 N. Carson Street
 4 Carson City, Nevada 89701-4717
 Tel: (775) 684-1159
 5 E-mail: savillo@ag.nv.gov

6 *Attorneys for Defendants*
Renee Baker, Dwayne Baze,
 7 *Tara Carpenter, James G. Cox,*
James Dzurenda and Ronda Larsen

8
 9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARK MANIBUSAN,
 12
 Plaintiff,

13 v.

14 NEVADA DEPARTMENT OF
 CORRECTIONS, et al.,
 15
 Defendants.

Case No. 3:17-cv-00303-MMD-CLB

**STIPULATION TO EXTEND DISPOSITIVE
 MOTION DEADLINE
 (FIRST REQUEST)**

17 Defendants, Renee Baker, Dwayne Baze, Tara Carpenter, James G. Cox, James Dzurenda and
 18 Ronda Larsen, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and
 19 Stephen J. Avillo, Deputy Attorney General, respectfully submit the following Stipulation and Order to
 20 Extend the Dispositive Motion deadline. The parties have previously stipulated to extend the discovery
 21 deadline, and this Stipulation is the first request for an extension of only the dispositive motion
 22 deadline. This stipulation is entered by the parties in good faith and not for the purpose of delay.

23 Discovery in this matter concluded September 27, 2021, and dispositive motions are due
 24 November 1, 2021. ECF No. 63. Counsel for Plaintiff provided to counsel for Defendants amended
 25 initial disclosures on October 22, 2021. This late disclosure was the result of excusable oversight and
 26 not for the purpose of delay, and all documents included in the Amended Disclosures had been
 27 produced to counsel previously, before the close of discovery.

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1 Additionally, counsel for Defendants is in the process of transitioning to a different position
2 within the Office of the Attorney General and has spent considerable time in the weeks leading up to
3 the current deadline on that transition. The current matter is a complex matter by the standards of
4 inmate litigation, and extending the dispositive motion deadline will allow the parties to fully brief the
5 issues, utilizing all the discovery provided to date.

6 The parties submit that this stipulation is entered into in good faith and not for the purposes of
7 delay.

8 Parties therefore stipulate to respectfully request a 30-day extension of the dispositive motion
9 deadline, to December 1, 2021.

10
11 DATED this 28th day of October, 2021.

12 ROBERT L. LANGFORD & ASSOCIATES

AARON D. FORD
Attorney General

13
14 By: /s/ Matthew J. Rashbrook
15 MATTHEW J. RASHBROOK, ESQ.
16 Nevada Bar No. 12477
Attorneys for Plaintiff

By: /s/ Stephen J. Avillo
STEPHEN J. AVILLO, ESQ.
Nevada Bar No. 11132
Attorneys for the NDOC Defendants

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18 IT IS SO ORDERED.

19 Dated: November 2, 2021

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22 _____
23 UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that
3 on this 1st day of November, 2021, I caused to be served a copy of the foregoing, **STIPULATION TO**
4 **EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)**, by U.S. District Court

5 CM/ECF Electronic Filing to:

6 Robert L. Langford
7 Matthew J. Rashbrook
8 Robert L. Langford & Associates
9 616 South Eighth Street
Las Vegas, NV 89101
robert@robertlangford.com
Attorneys for Plaintiff

10
11 */s/ Roberta W. Bibee*
12 An employee of the Office
13 of the Attorney General
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