

1 Robert L. Langford, Esq.
2 Nevada State Bar No. 3988
3 Matthew J. Rashbrook
4 Nevada State Bar No. 12477
5 Robert L. Langford & Associates
6 1925 Village Center Circle, Suite 150
7 Las Vegas, NV 89134
(702) 471-6565
robert@robertlangford.com
matt@robertlangford.com
Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MARK MANIBUSAN,
11 Plaintiff,
12 v.
13 NEVADA DEPARTMENT OF
14 CORRECTIONS, *et al.*,
15 Defendants

16 Case No.: 3:17-cv-00303-MMD-CBC

17 **STIPULATION AND ORDER TO**
EXTEND DISPOSITIVE MOTION
DEADLINE

18 (Third Request)

19 Pursuant to Local Rule 26-4, Plaintiff Mark Manibusan, by and through his
20 counsel, Robert L. Langford, Esq., and Matthew J. Rashbrook, and Defendants Renee
21 Baker, Dwayne Baze, Tara Carpenter, James G. Cox, James Dzurenda, and Ronda Larsen
22 (the “NDOC Defendants”), by and through their counsel, Aaron D. Ford, Nevada Attorney
23 General, and John C. Dorame, Deputy Attorney General, respectfully submit the following
24 Stipulation and Order to Extend the Dispositive Motion deadline. This Stipulation is the
25 third request for such an extension, and is entered by the parties in good faith and not for
26 the purpose of delay.

27 ///

28 ///

ROBERT L. LANGFORD & ASSOCIATES
1925 VILLAGE CENTER CIRCLE, SUITE 150
LAS VEGAS, NEVADA 89134
(702) 471-6565 • FAX (702) 471-6540

DISCOVERY COMPLETED

- Plaintiff's Initial Disclosures
 - Defendants Initial Disclosures
 - Plaintiff's Interrogatories to Defendants
 - Plaintiff's Request for Production of Documents to NDOC Defendants
 - Plaintiff's Request for Admission to NDOC Defendants

DISCOVERY REMAINING

No additional discovery is needed in this matter. The remaining case management deadlines are:

Dispositive motion deadline: **January 10, 2022**

Joint pretrial order (if no dispositive motions filed): **March 2, 2022**

REASONS DEADLINE HAS NOT BEEN SATISFIED

1. During the previous deadline period, counsel for Plaintiff Mark
an has been absent from the office caring for his spouse while she suffered an
hich required hospitalization. This has caused a significant drop in productivity
undersigned is unable to comply with the present deadline.

2. As indicated in the previous request for an extension of this deadline (ECF. 67), counsel for defendants was assigned this matter on or about November 8, 2021. At or around the same time, current counsel inherited a number of other matters from prior counsel, all with nearly concurrent significant deadlines. Counsel has endeavored to comply with these all, but in order to have an adequate opportunity to become familiar with the facts and circumstances, as well as the legal arguments presented in this matter, counsel requires further time.

111

111

PROPOSED SCHEDULE

The parties propose that the following current deadlines be extended by 30 days:

1. The current deadline for dispositive motions is January 10, 2021. The Parties stipulate that deadline be extended to February 9, 2022.

2. The parties must file a Joint Pretrial Order no later than March 2, 2022. The parties stipulate that deadline be extended to April 1, 2022. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after a decision on the dispositive motions, or further order of the Court.

For the foregoing reasons, Mr. Manibusan and the NDOC Defendants hereby stipulate to the above extensions.

IT IS SO STIPULATED, this 10th day of January, 2022.

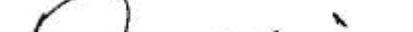
/s/ Matthew J. Rashbrook
Matthew J. Rashbrook
Nevada State Bar No. 12477
Robert L. Langford & Associates
1925 Village Center Circle, Suite 150
Las Vegas, NV 89134
Attorneys for Plaintiff

/s/ John C. Dorame
John C. Dorame
Deputy Attorney General
Nevada State Bar No. 10029
100 N. Carson St.
Carson City, NV 89701
Attorneys for NDOC Defendants

ORDER

Based on the foregoing stipulation, the deadline for dispositive motions and joint pretrial order shall be extended as described.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

This 10th day of January, 2022.