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8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

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

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

STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
DEFENDANTS’ MOTION FOR
SUMMARY JUDGMENT

(First Request)

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

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REASONS DEADLINE HAS NOT BEEN SATISFIED

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2 1. In order to fully address the complex legal arguments raised in
3 Defendants' Motion, Plaintiff requires an additional two weeks' time to respond to the
4 Motion for Summary Judgment, in order to complete necessary additional legal research.

PROPOSED SCHEDULE

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6 The parties propose that the following current deadlines be extended by 14 days:

7 1. The current deadline is March 1, 2022. The Parties stipulate that deadline
8 be extended to March 15, 2022.

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

11 IT IS SO STIPULATED, this 28th day of February, 2022.

12
13 /s/ Matthew J. Rashbrook
14 Matthew J. Rashbrook
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/s/ John C. Dorame
John C. Dorame
Deputy Attorney General
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Carson City, NV 89701
Attorneys for NDOC Defendants

ORDER

20 Based on the foregoing stipulation, the deadline to respond to Defendants' Motion
21 for Summary Judgment shall be extended as described.

22 **IT IS SO ORDERED.**

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24 
25 _____
26 UNITED STATES MAGISTRATE JUDGE

27 This 1st day of March, 2022.

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