

1 AARON D. FORD  
 Attorney General  
 2 JOHN C. DORAME, Bar No. 10029  
 Deputy Attorney General  
 3 State of Nevada  
 100 N. Carson Street  
 4 Carson City, Nevada 89701-4717  
 Tel: (775) 684-1261  
 5 E-mail: jdorame@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 AND ORDER TO  
 EXTEND DEADLINE TO FILE REPLY  
 IN SUPPORT OF DEFENDANTS'  
 MOTION FOR SUMMARY JUDGMENT**  
**(FIRST REQUEST)**

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

25 **A. Reasons why the Deadlines Were not Satisfied**

26 Due to an unexpected increase in defense counsel's case load, which case have need  
 27 immediate and substantial attention since the filing of Plaintiff's Opposition to  
 28 Defendants' Motion for Summary Judgment, as well as other dispositive motion deadlines

1 occurring at or near the same time as the instant matter, defense counsel has been unable  
2 to comply with the deadline to file replies, currently set for March 29, 2022. As a result,  
3 defense counsel requested, and Plaintiff has graciously stipulated to, a short extension of  
4 the reply deadline.

5 **B. Proposed Schedule**

6 The parties propose that the following current deadlines be extended by 10 days:

7 1. The current deadline for reply briefs is March 29, 2022. The Parties  
8 stipulate that deadline be extended to April 8, 2022.

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

11 DATED this 28<sup>th</sup> day of March, 2022.

12 ROBERT L. LANGFORD & ASSOCIATES

AARON D. FORD  
Attorney General

14 By: /s/ Matthew J. Rashbrook  
15 MATTHEW J. RASHBROOK, ESQ.  
16 Nevada Bar No. 12477  
17 Robert L. Langford & Associates  
1925 Village Center Circle, Suite 150  
Las Vegas, NV 89134  
*Attorneys for Plaintiff*

By: /s/ John C. Dorame  
JOHN C. DORAME, ESQ.  
Nevada Bar No. 10029  
Nevada State Bar No. 10029  
100 N. Carson St.  
Carson City, NV 89701  
*Attorneys for Defendants*

18 **ORDER**

19  
20 Based on the foregoing stipulation of the parties, the deadline to file a Reply in  
21 Support of Defendants' Motion for Summary Judgment shall be extended as described.

22 **IT IS SO ORDERED.**


23  
24   
25 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

26 This 28th day of March, 2022.  
27  
28

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on March 28, 2022, I electronically filed the foregoing, **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

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

  
An employee of the Office  
of the Attorney General