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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MARY KIM PICCININI<sup>1</sup>, and  
GEORGE ELDRIDGE & SON, INC.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:17-cv-00584-HDM-WGC

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO MOTION TO  
STRIKE (ECF NO. 55)**

**(SECOND REQUEST)**

Defendant United States of America and Plaintiff George Eldridge & Son, Inc., hereby stipulate and agree that Defendant may have a 14-day extension to file its response to Plaintiffs' Motion to Strike Documents Produced with Defendant's Amended Third Supplemental Disclosure Statement. (ECF No. 55). Defendant's response is currently due on January 10, 2020. An extension is warranted because the parties are attempting to settle the case. An extension

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<sup>1</sup> The Court dismissed Plaintiff Mary Kim Piccinini's claims with prejudice on December 31, 2019 (*See* ECF No. 62).

1 would allow defense counsel to focus on the settlement negotiations with Plaintiff's counsel and  
2 to meaningfully discuss and assess those negotiations, and possible settlement options, with  
3 representatives from the Department of Justice. A 14-day extension would give Defendant up to  
4 and including January 24, 2020, in which to respond to the motion to strike.

5 This is Defendant's second request for an extension of time. The extension would not  
6 prejudice either party since trial is not scheduled until June 2020.

7 Dated: January 7, 2020.

8 NICHOLAS A. TRUTANICH  
9 United States Attorney

ROSE LAW OFFICE

10 s/ Holly A. Vance  
11 HOLLY A. VANCE  
Assistant United States Attorney  
Counsel for Defendant

s/ Sean P. Rose  
SEAN P. ROSE  
Counsel for Plaintiff George Eldridge  
& Son, Inc.

12 DURNEY & BRENNAN LTD.

13 s/ Thomas R. Brennan  
14 THOMAS R. BRENNAN  
Counsel for Plaintiff George Eldridge  
15 & Son, Inc.

16  
17 **IT IS SO ORDERED.**

18  
19 **DATED: January 8, 2020.**

William G. Cobb  
20 **HON. WILLIAM G. COBB**  
21 **United States Magistrate Judge**  
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