

1 RICHARD F. HOLLEY, ESQ.
 Nevada Bar No. 3077
 2 E-mail: rholley@nevadafirm.com
 CLARK V. VELLIS, ESQ.
 3 Nevada Bar No. 5533
 E-mail: cvellis@nevadafirm.com
 4 F. THOMAS EDWARDS, ESQ.
 Nevada Bar No. 9549
 5 E-mail: tedwards@nevadafirm.com
 MICHAEL R. AYERS, ESQ.
 6 Nevada Bar No. 10851
 E-mail: mayers@nevadafirm.com
 7 HOLLEY DRIGGS WALCH
 FINE WRAY PUZEY & THOMPSON
 8 800 S. Meadows Parkway
 Reno, Nevada 89521
 9 Telephone: 775/851-8700
 Facsimile: 775/851-7681

10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 ARGENT PREPARATORY ACADEMY f/k/a
 13 SILVER STATE CHARTER SCHOOLS,

14 Plaintiff,

15 v.

16 PHILADELPHIA INDEMNITY INSURANCE
 17 COMPANY, a Pennsylvania insurance business
 corporation; and DOES I through XX,

18 Defendants.

Case No.:3:18-cv-00134-MMD-WGC

**STIPULATION AND ORDER
 EXTENDING DEADLINE FOR
 ARGENT PREPARATORY
 ACADEMY f/k/a SILVER STATE
 CHARTER SCHOOLS TO FILE ITS
 REPLY IN SUPPORT OF ITS
 MOTION FOR SUMMARY
 JUDGMENT AND TO FILE ITS
 OPPOSITION TO DEFENDANT’S
 COUNTERMOTION FOR
 SUMMARY JUDGMENT**

**[FIRST REQUEST FOR
 EXTENSION]**

24
 25 COMES NOW, Plaintiff ARGENT PREPARATORY ACADEMY f/k/a SILVER
 26 STATE CHARTER SCHOOLS (“Plaintiff”), and Defendant, PHILADELPHIA INDEMNITY
 27 INSURANCE COMPANY (“Philadelphia”), by and through their respective counsel of record,
 28 stipulate and agree to extend the deadline by a week for Plaintiff to filed its Reply in Support of

1 its Motion for Summary Judgment (“Reply”, ECF No. 14) and its Opposition to Philadelphia’s
2 Countermotion for Summary Judgment (“Opposition”, ECF No. 19). Currently, Plaintiff’s Reply
3 is due on September 4, 2018, but would be extended to on or before September 11, 2018. The
4 Opposition is due September 10, 2018 but would be extended until on or before September 17,
5 2018.

6 This is Plaintiff’s first request for an extension on the Reply and Opposition, which is
7 necessary due to workloads and the extended weekend for Labor Day. Philadelphia has no
8 opposition to Plaintiff’s request for these extensions.

9 No additional requests for extensions are contemplated.

10 **IT IS SO STIPULATED.**

11 DATED this 30th day of August 2018.

12 FORAN GLENNON PALADECH PONZI
13 & RUDLOFF, PC

HOLLEY DRIGGS WALCH FINE WRAY
PUZEY & THOMPSON

14
15 /s/ Casey G. Perkins, (with permission)
16 Casey G. Perkins, Esq.
17 Nevada Bar No 12063
18 2200 Paseo Verde Parkway, Suite 280
19 Henderson, NV 89052
20 Telephone: (702) 827-1510
21 Facsimile: (312) 863-5099
22 Email: cperkins@fgppr.com
23 *Attorneys for Defendant Philadelphia*
24 *Indemnity Insurance Company*

/s/ Michael R. Ayers
Michael R. Ayers, Esq.
Nevada Bar No. 10851
800 S. Meadow Parkway, Suite 800
Reno, NV 89521
Tel: 775-851-8700
Fax: 775-851-7681
Email: mayers@nevadafirm.com
Attorneys for Plaintiff Argent Preparatory
Academy f/k/a Silver State Charter Schools

25 **ORDER**

26 IT IS SO ORDERED:

27 

28 UNITED STATES DISTRICT JUDGE

Dated: September 4, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested, in this action. On this date, I caused to be served a true and correct copy of the foregoing STIPULATION AND ORDER EXTENDING DEADLINE FOR ARGENT PREPARATORY ACADEMY f/k/a SILVER STATE CHARTER SCHOOLS TO FILE ITS REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT AND TO FILE ITS OPPOSITION TO DEFENDANT’S COUNTERMOTION FOR SUMMARY JUDGMENT by the method indicated:

- _____ U.S. Mail
- _____ Facsimile Transmission
- XXX Electronic Filing via EC/CMF electron

Amy M. Samberg, Esq.
Nevada Bar No. 10212
FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
Two Renaissance Tower
One North Central Avenue, 18th Floor
Phoenix, AZ 85004
Email: asamberg@fgppr.com

Casey G. Perkins, Esq.
Nevada Bar No 12063
FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
2200 Paseo Verde Parkway, Suite 280
Henderson, NV 89052
Email: cperkins@fgppr.com

/s./ Susan Matejko
An Employee of HOLLEY DRIGGS WALCH
FINE WRAY PUZEY & THOMPSON