

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
2200 Paseo Verde Parkway, Suite 280
Henderson, Nevada 89052

1 Amy M. Samberg, Esq.
Nevada Bar No. 10212
2 FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC
3 Two Renaissance Tower
One North Central Avenue, 18th Floor
4 Phoenix, AZ 85004
Telephone: (602) 777-6230
5 Facsimile: (312) 863-5099
Email: asamberg@fgppr.com

6
7 Casey G. Perkins, Esq.
Nevada Bar No 12063
FORAN GLENNON PALANDECH
8 PONZI & RUDLOFF PC
2200 Paseo Verde Parkway, Suite 280
9 Henderson, NV 89052
Telephone: (702) 827-1510
10 Facsimile: (312) 863-5099
Email: cperkins@fgppr.com

11
12 *Attorneys for Philadelphia Indemnity
Insurance Company*

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15
16 ARGENT PREPARATORY ACADEMY f/k/a/
SILVER STATE CHARTER SCHOOLS

17 Plaintiffs,

18 vs.

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

21 Defendants.
22

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

**STIPULATION AND ORDER TO
EXTEND THE DATE FOR
PHILADELPHIA INDEMNITY
INSURANCE TO FILE ITS REPLY
IN SUPPORT OF ITS
COUNTERMOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

23 IT IS HEREBY STIPULATED AND AGREED between Plaintiff Argent Preparatory
24 Academy f/k/a Silver State Charter Schools and Defendant Philadelphia Indemnity Insurance
25 Company, by and through the parties' respective counsel, pending the Court's approval, that the
26 date for Defendant to file its Reply in Support of its Countermotion for Summary Judgment (ECF
27 No. 19) to October 8, 2018.
28

1 Pending the Court's approval, counsel for Plaintiff's has graciously agreed to a 1-week
2 extension, from the current deadline of October 1, 2018 to October 8, 2018. The Counter-motion
3 was filed on August 20, 2018 and Plaintiff's Opposition (ECF No. 26) was filed on September 17,
4 2018. This request is the first request for an extension of the subject deadline, and is made
5 primarily in light of defense counsel's extensive travel schedule between September 17, 2018 and
6 October 1, 2018, including travel related to deposition discovery in other matters pending in this
7 District and will ensure sufficient time for Philadelphia to fully address the issues raised in
8 Plaintiff's Opposition.

9 The parties respectfully request that this Court approve the foregoing stipulation.

10 DATED: September 26, 2018

DATED: September 26, 2018

11 HOLLY DRIGGS WALCH FINE WRAY
12 PUZEY & THOMPSON

FORAN GLENNON PALANDECH PONZI
& RUDLOFF PC

13 By: /s/ Michael R. Ayers, Esq.

By: /s/ Casey G. Perkins, Esq.

14 Richard F. Holley, Esq.
15 Clark V. Vellis, Esq.
16 F. Thomas Edwards, Esq.
17 Michael R. Ayers, Esq.
18 800 S. Meadows Parkway
19 Reno, NV 89521

Amy M. Samberg, Esq.
Two North Central Avenue, 18th Floor
Phoenix, AZ 85004

Casey G. Perkins, Esq.
2200 Paseo Verde Parkway, Ste. 280
Henderson, NV 89052

Attorneys for Plaintiff

Attorneys for Defendant

20
21 **ORDER**

22 **IT IS SO ORDERED.**

23
24 DATED this 26th day of September 2018.

25
26 

UNITED STATES DISTRICT JUDGE