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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RON SCHRECKENGOST, an individual, and  
ELIZABETH WALSH, an individual,

CASE NO: 3:19-cv-00659-MMD-CLB

Plaintiff,  
vs.  
THE STATE OF NEVADA *ex rel.* the  
NEVADA DEPARTMENT OF  
CORRECTIONS; and PERRY RUSSELL, an  
individual.

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**STIPULATION, REQUEST, AND  
[PROPOSED] ORDER  
ENLARGING TIME FOR  
PLAINTIFFS TO OPPOSE DEFENDANTS'  
TWO MOTIONS TO DISMISS  
(ECF 069 and ECF 070)**  
**(SECOND REQUEST)**

Defendants.

The parties to this action, by and through their undersigned counsel of record hereby stipulate that Plaintiffs may have a 10-day extension of time to file their opposition briefs to Defendants' two motions to dismiss (ECF 069 and ECF 070), through and including Monday, Nov. 30, 2020. Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement of time. This is the second request for such an extension. The current deadline to file these two opposition briefs is Friday, November 20, 2020, which deadline has not yet run. The reasons that additional time is requested here is because Plaintiff's Counsel underestimated the amount of time it would take to complete these opposition briefs, when first requesting an extension, given the fact that he had been and continued to be quite busy with many pressing matters in other cases. As well, the offices of Plaintiff's Counsel will be closed for the Thanksgiving Holiday, November 26-27, 2020, which necessitates an

1 extension through the Monday, November 30, 2020, immediately after the holiday. This stipulation  
2 and request are not made for any dilatory or improper purpose.

3 Dated this 18th Day of November.

THE GEDDES LAW FIRM, P.C.



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12 *Attorneys for Plaintiffs Ron  
13 Schreckengost and Elizabeth  
14 Walsh*

15 Dated this 18<sup>th</sup> Day of November .

16 AARON D. FORD  
17 Nevada Attorney General

18 *Electronic Signature Authorized*

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19 /s/ Brandon R. Price  
20 BRANDON R. PRICE  
21 Senior Deputy Attorney General  
22 Nevada Bar No. 11686  
23 SCOTT H. HUSBANDS  
24 Deputy Attorney General  
25 Nevada Bar No. 11398  
26 State of Nevada  
27 Office of the Attorney General  
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(775) 687-2121 (phone)  
*Attorneys for Defendants, State of  
Nevada ex rel. its Department of  
Corrections and  
Perry Russell*

**ORDER**

29 Dated: November 20, 2020

30 IT IS SO ORDERED



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31 UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on November 18, 2020, I caused to be served a copy of the foregoing *Stipulation, Request, and [Proposed] Order Enlarging Time for Plaintiffs to Oppose Defendants' Two Motions to Dismiss (ECF 069 and ECF 070) (Second Request)*, by filing the same with the Court's electronic filing system (PACER), addressed to the following:

AARON D. FORD  
Nevada Attorney General  
BRANDON R. PRICE  
Senior Deputy Attorney General  
SCOTT H. HUSBANDS  
Deputy Attorney General  
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