

||

1 Christopher B. Reich, Esq., Nev. Bar No. 10198  
[creich@washoeschools.net](mailto:creich@washoeschools.net)  
 2 Neil A. Rombardo, Esq., Nev. Bar No. 6800  
[nrombardo@washoeschools.net](mailto:nrombardo@washoeschools.net)  
 3 Sara K. Montalvo, Esq., Nev. Bar No. 11899  
[sara.montalvo@washoeschools.net](mailto:sara.montalvo@washoeschools.net)  
 4 WASHOE COUNTY SCHOOL DISTRICT  
 P.O. Box 30425  
 5 Reno, NV 89520-3425  
 Telephone: 775-348-0300  
 6 Fax: 775-333-6010  
 Attorneys for Defendant Washoe County School District

7

8 UNITED STATES DISTRICT COURT  
 9 DISTRICT OF NEVADA

10 VICTORIA COATES, an individual,  
 11 Plaintiff,  
 12 vs.  
 13 WASHOE COUNTY SCHOOL DISTRICT  
 Political subdivision of the State of Nevada  
 14 Defendant.  
 15 \_\_\_\_\_

CASE NO.: 3:20-cv-00182- LRH-CLB

**STIPULATION AND ORDER TO  
 EXTEND TIME TO RESPOND TO  
 COMPLAINT**

(first request)

Office of the General Counsel

16 COMES NOW, Defendant Washoe County School District (the “District”) and Plaintiff  
 17 Victoria Coates (“Plaintiff”), by and through their respective counsel of record, and hereby  
 18 stipulate and agree, pursuant to Federal Rules of Civil Procedure 6(b) and Civil Local Rules IA  
 19 6-1 and 7-1, to extend the deadline for the District’s answer or response to Plaintiff’s Complaint  
 20 to May 6, 2020. This Stipulation is based on the following:

21 1. As a courtesy to Plaintiff, the District accepted service of the Summons and  
 22 Complaint on April 1, 2020 [ECF 1; ECF 5].

23 ///

||

1           2.       Due to the current COVID-19 pandemic and the current increased workload of  
2 the District and its Office of the General Counsel, the District and Plaintiff stipulate and agree  
3 that it is in their mutual best interests to extend the deadline for the District’s answer or response  
4 to Plaintiff’s Complaint.

5           3.       The District and Plaintiff stipulate and agree to extend the deadline for the  
6 District’s answer or response to Plaintiff’s Complaint to May 6, 2020.

7           4.       This is the first Stipulation for extension of time to answer or otherwise respond  
8 to Plaintiff’s Complaint.

9           5.       This Stipulation is made in good faith and is not for the purposes of delay.

10          DATED this 13<sup>th</sup> day of April, 2020.

DATED this 13<sup>th</sup> day of April, 2020.

11  
12

13          By: /s/Kenneth K. Ching, Esq.  
14             Kenneth K. Ching, Esq.  
              [ken@argentumnv.com](mailto:ken@argentumnv.com)  
15             6121 Lakeside Drive, Suite 208  
              Reno, Nevada 89511  
16             Attorney for Plaintiff Victoria Coates

By: /s/Christopher B. Reich, Esq.  
Christopher B. Reich, Esq.  
[creich@washoeschools.net](mailto:creich@washoeschools.net)  
Neil A. Rombardo, Esq.  
[nrombardo@washoeschools.net](mailto:nrombardo@washoeschools.net)  
Sara Montalvo, Esq.  
[salmo@washoeschools.net](mailto:salmo@washoeschools.net)  
P.O. Box 30425  
Reno, Nevada 89520-3425  
Attorneys for Defendant  
Washoe County School District

17  
18  
19

20           IT IS SO ORDERED:

21  
22

  
UNITED STATES MAGISTRATE JUDGE

23

DATED: April 14, 2020