

1 CARSON CITY DISTRICT ATTORNEY

Jason D. Woodbury, Esq.

2 NV Bar No. 6870

Adam Tully, Esq.

3 NV Bar No. 13601

885 East Musser Street, Suite 2030

4 Carson City, NV 89701

T: (775) 887-2070

5 F: (775) 887-2129

jwoodbury@carson.org

6 atully@carson.org

Attorneys for Defendant Carson City

7
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 **MASTON CRAPPS and KATHERINE**
12 **CARTER,**

13 **Plaintiffs,**

14 **v.**

15 **CARSON CITY, NEVADA, a consolidated**
16 **municipality and political subdivision of the**
17 **State of Nevada; and DOES 1-100, inclusive,**

Defendants.

Case No. 3:22-cv-00379-ART-CSD

STIPULATION TO EXTEND TIME
FOR DEFENDANT CARSON CITY
TO RESPOND TO PLAINTIFFS'
COMPLAINT [ECF No. 1]

(First Request)

18 Defendant Carson City, Nevada ("City"), by and through its counsel, Jason D.
19 Woodbury, Carson City District Attorney, and Adam Tully, Deputy District Attorney, and
20 Plaintiffs Matson Crapps and Katherine Carter, by and through their counsel, Mark
21 Forsberg, Esq. and Oshinski & Forsberg, Ltd., respectfully submit this Stipulation to Extend
22 Time for Defendant Carson City to Respond to Plaintiffs' Complaint [ECF No. 1]
23 ("Stipulation"). This Stipulation is made in accordance with LR IA 6-1, LR IA 6-2, and LR
24 7-1. This is the first request to extend the deadline for the City to file a response to Plaintiffs'

1 Complaint [ECF No. 1], served on August 29, 2022, from September 19, 2022, to **October**
 2 **13, 2022.**

3 The power to control litigation to which the City is a party ultimately rests with the
 4 City's elected Board of Supervisors ("Board"). *See* NRS 244.165; *see also* NRS 0.0305,
 5 0.033. City's counsel does not anticipate having the opportunity to consult with the Board
 6 on this matter until the Board's October 6, 2022, meeting. Therefore, the City has requested,
 7 and Plaintiffs have consented to, an extension allowing the City to file its response to
 8 Plaintiffs' Complaint on or before October 13, 2022.

9 THEREFORE, upon agreement of the parties, through their respective counsel, the
 10 undersigned respectfully request that this Court grant an extension of time permitting the
 11 City to file its response to Plaintiffs' Complaint [ECF No. 1] on or before October 13, 2022.

12 DATED this 14th day of September, 2022.

13 CARSON CITY DISTRICT ATTORNEY

OSHINSKI & FORSBERG, LTD.

14 By: /s/ Adam Tully, Esq.

By: /s/ Mark Forsberg, Esq.

15 Jason D. Woodbury, Esq.

Mark Forsberg, Esq.

16 NV Bar No. 6870

NV Bar No. 4265

17 Adam Tully, Esq.

Attorneys for Plaintiffs

NV Bar No. 13601

Attorneys for Defendant Carson City

18
 19 **ORDER**

20 IT IS SO ORDERED

21 
 22 UNITED STATES MAGISTRATE JUDGE

23 DATED: September 14, 2022