

1 CARSON CITY DISTRICT ATTORNEY  
2 Jason D. Woodbury, Esq.  
3 NV Bar No. 6870  
4 Adam Tully, Esq.  
5 NV Bar No. 13601  
6 885 East Musser Street, Suite 2030  
7 Carson City, NV 89701  
8 T: (775) 887-2070  
9 F: (775) 887-2129  
10 [jwoodbury@carson.org](mailto:jwoodbury@carson.org)  
11 [atully@carson.org](mailto:atully@carson.org)  
12 *Attorneys for Defendant Carson City*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 MASTON CRAPPS and KATHERINE  
CARTER,

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

## Plaintiffs,

V.

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

## Defendants.

**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, Caron 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.  
15 Jason D. Woodbury, Esq.  
NV Bar No. 6870  
16 Adam Tully, Esq.  
NV Bar No. 13601  
17 *Attorneys for Defendant Carson City*

By: /s/ Mark Forsberg, Esq.  
Mark Forsberg, Esq.  
NV Bar No. 4265  
*Attorneys for Plaintiffs*

18  
19 **ORDER**

20 IT IS SO ORDERED

21   
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: September 14, 2022