

BAKER & HOSTETLER LLP  
DENVER  
HOWARD & HOWARD  
LAS VEGAS

1 Laurin D. Quiat, Bar No. 14687 (*pro hac vice*)  
lquiat@bakerlaw.com  
2 Sammantha J. Tillotson Bar No. 50267 (*pro hac vice*)  
stillotson@bakerlaw.com  
3 **BAKER & HOSTETLER LLP**  
1801 California St., Suite 4400  
4 Denver, CO 80202  
Telephone: 303.861.0600  
5 Facsimile: 303.861.7805

6 Robert W. Hernquist, Nevada Bar No. 10616  
rhernquist@howardandhoward.com  
7 **HOWARD & HOWARD**  
3800 Howard Hughes Pkwy, Ste 1000  
8 Las Vegas, NV 89169  
Telephone: 702.667.4834  
9 Facsimile: 702.567.1568

10 *Attorneys for Defendant*  
*Aspen Pumps, Inc.*

11 Roger O'Donnell  
12 Steve Guinn  
**LAXALT LAW GROUP**  
13 9790 Gateway Dr., Suite 200  
Reno, NV 89521  
14 *Attorneys for Plaintiff*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

18 BROTHERHOOD MUTUAL  
INSURANCE COMPANY, as Subrogee  
19 of GRACE COMMUNITY CHURCH OF  
RENO

20 Plaintiff,

21 v.

22 ASPEN PUMPS; and DOE  
DEFENDANTS 1-10,

23 Defendants.

Case No.: 3:24-CV-00037-CSD

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT'S  
DEADLINE TO RESPOND TO  
PLAINTIFF'S MOTION TO DEEM  
CERTAIN FACTS ADMITTED (Doc.  
36) AND MOTION IN LIMINE TO  
EXCLUDE DEFENDANT'S EXPERT  
REPORTS (Doc. 35)**

**(FIRST REQUEST)**

24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Plaintiff Brotherhood Mutual Insurance Company (“Brotherhood” or “Plaintiff”) and Defendant Aspen Pumps, Inc. (“Aspen Pumps” or “Defendant”) (collectively the “Parties”), by and through their counsel of record, submit this stipulation to extend the deadline for Defendant to file its Opposition briefs to Plaintiff’s Motion to Deem Certain Facts Admitted (Doc. 36) and Plaintiff’s Motion in Limine to Exclude Defendant’s Expert Report and Rebuttal Expert Report and All Supplements Thereto (Doc. 35) from December 5, 2024, to December 11, 2024. This is the parties’ first request to extend these deadlines. This Motion is supported by good cause and not made for the purposes of undue delay. Presently, there is no trial scheduled. Fact discovery is set to close on December 31, 2024.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IT IS SO STIPULATED

DATED: November 25, 2024

**LAXALT LAW GROUP**

**BAKER & HOSTETLER LLP**

By: /s/ Roger O'Donnell  
Roger O'Donnell  
Steve Guinn  
Laxalt Law Group  
9790 Gateway Dr., Suite 200  
Reno, NV 89521

*Attorneys for Plaintiff*

By: /s/ Sammantha J. Tillotson  
Laurin D. Quiat (*pro hac vice*)  
Sammantha J. Tillotson (*pro hac vice*)  
Baker & Hostetler LLP  
1801 California St.  
Suite 4400  
Denver, CO 80202

Robert W. Hernquist  
Howard & Howard  
3800 Howard Hughes Parkway,  
Suite 1000  
Las Vegas, Nevada 89169

*Attorneys for Defendant*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

This Court, having reviewed and considered the Stipulation by the parties, and Good Cause Appearing therefore, the deadline for Defendant’s Opposition to Plaintiff’s Motion to Deem Certain Facts Admitted (Doc. 36) and Motion in Limine to Exclude Defendant’s Expert Report and Rebuttal Expert Report and All Supplements Thereto (Doc. 35) is hereby **EXTENDED** from December 5, 2024, to December 11, 2024

**IT IS SO ORDERED.**

DATED this 26th day of November, 2024.

  
UNITED STATES MAGISTRATE JUDGE