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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAHLIA DWEDAR,

Plaintiff,

v.

STATE OF NEVADA EX REL. BOARD OF
REGENTS OF THE NEVADA SYSTEM OF
HIGHER EDUCATION, ON BEHALF OF
THE UNIVERSITY OF NEVADA RENO,

Defendant.

Case No. 3:24-CV-00583-MMD-CLB

**ORDER GRANTING STIPULATION
REGARDING TIME TO FILE
RESPONSIVE PLEADING
(First Request)**

Plaintiff Dahlia Dwedar ("Plaintiff") appearing through counsel of record Trevor J. Hatfield, Esq., Defendant Board of Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Reno ("UNR") appearing through counsel of record Claudia E. Aguayo, Esq., Frank Z. LaForge, Esq. and Scott H. Husbands, Esq., hereby stipulate that UNR shall have up to and including March 21, 2025 to file its responsive pleading to Plaintiff's

1 Complaint. In support of their stipulation, the Parties provide the following pursuant to and in
2 compliance with LR IA 6-1, LR IA 6-2, and LR 7-1:

- 3 1. Plaintiff filed her Complaint on December 17, 2024. (ECF No. 1)
- 4 2. Plaintiff served UNR on February 4, 2025. (ECF No. 7) Under FRCP 12, assuming
5 service was complete, UNR's responsive pleading would have been due on February
6 25, 2025.
- 7 3. On February 24, 2025, UNR's counsel reached out to Plaintiff's counsel to discuss a
8 proposed extension of two weeks. UNR's need for the extension was largely based
9 on counsel of record in this matter being occupied with another lawsuit in federal
10 court. That issue, and other pre-existing professional obligations, left UNR without
11 the time it needed to prepare and file its responsive pleading. Plaintiff's counsel
12 agreed to the request for a continuance and counsel stipulated to request a two-week
13 extension. Following counsel's agreement on a two-week stipulation, UNR
14 discovered that Plaintiff had not filed a necessary affidavit of service showing
15 service on the Office of the Attorney General. UNR's counsel reached out to
16 Plaintiff's counsel to advise of the issue and that no responsive pleading was due
17 because it appeared service was incomplete. Plaintiff filed the necessary affidavit of
18 service on February 26 but did not reach out to UNR's counsel regarding the filing.
19 UNR did not discover that the affidavit was filed until March 10, 2025. At that time,
20 UNR's counsel reached out to Plaintiff's counsel to discuss a new responsive
21 pleading deadline. Counsel agreed that UNR would have up to and including March
22 21, 2025 to file its responsive pleading.

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- 1 4. This is the Parties' first stipulation to extend the time for UNR to file its responsive
2 pleading.
- 3 5. The Parties therefore request that UNR have up to and including March 21, 2025 to
4 submit its responsive pleading to Plaintiff's Complaint.
- 5 6. The Parties offer this stipulation in good faith and not for the purpose of delay.

6 STIPULATED and DATED this 12th day of March, 2025.

7 /s/ Trevor J. Hatfield

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13 **Attorney for Plaintiffs**

/s/ Scott H. Husbands

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Attorneys for Defendant

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18 **IT IS SO ORDERED.**

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21 UNITED STATES MAGISTRATE JUDGE

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23 DATED: March 12, 2025