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*Attorney for Defendant
Tesla, Inc. fka Tesla Motors, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MALCOLM SHEPHERD,

Plaintiff,

vs.

TESLA, INC., (a.k.a. TESLA MOTORS, INC.)
a Delaware Corporation; DOES I-X; and, ROE
Business Entities I-X,

Defendants.

Case No. 3:25-cv-00137-ART-CSD

**ORDER GRANTING
STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS
TO RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Malcolm Shepherd, ("Plaintiff"), by and through his counsel, Kemp & Kemp, and Defendant, Tesla, Inc. fka Tesla Motors, Inc. ("Defendant"), by and through their counsel, the law firm of Jackson Lewis P.C., that Defendant shall have an extension up to and including March 28, 2025, in which to file its response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed his Complaint on November 29, 2024 in the District Court, Clark County Nevada, Case No. A-24-907076-C. The Summons and Complaint were served on Defendant on or about February 14, 2025.

2. On March 7, 2025, the Defendant filed a Notice to Federal Court of Removal of Civil Action from State Court, Case No. 3:25-cv-00137-ART-CSD.

3. Defendant's response to the Complaint, following removal, is due on March 14, 2025.

4. Undersigned Defense Counsel represents Tesla Inc. in an unrelated arbitration case pending before JAMS and for which Plaintiff's counsel represents the claimant in that arbitration

1 case. Both Counsels are preparing for an arbitration hearing that begins on March 31, including
2 meeting and conferring regarding exhibits, witnesses, objections, and other matters for which
3 deadlines are fast approaching in the next two weeks.

4 5. Accordingly, Undersigned Defense Counsel needs additional time to prepare a
5 response to the complaint filed in this case, and requested Plaintiff agree to a two-week extension
6 to March 28, 2025. Plaintiff has kindly agreed to the requested extension.

7 6. Thus, the parties hereby stipulate to extend the deadline to March 28, 2025, for
8 Defendant to file its response to the Complaint.

9 7. This is the first request for an extension of time for Defendant to file its response to
10 Plaintiff's Complaint.

11 8. This Stipulation is made in good faith and not for the purpose of delay.

12 9. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair
13 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation
14 and Order shall be construed as an admission of or consent to the merit or validity of any claim,
15 defense, objection, or right by any party in this case.

16 Dated this 11th day of March, 2025.

17 KEMP & KEMP

JACKSON LEWIS P.C.

18 /s/ James P. Kemp
19 James P. Kemp, Esq., Bar #6375
20 7435 W. Azure Drive, Ste. 110
Las Vegas, Nevada 89130


/s/ Deverie J. Christensen
Deverie J. Christensen, Bar # 6596
300 South Fourth Street, Suite 900
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21 *Attorney for Plaintiff*
22 *Malcolm Shepherd*

Attorney for Defendant
Tesla, Inc. fka Tesla Motors, Inc.

23 **ORDER**

24 IT IS SO ORDERED.

25 
26 United States Magistrate Judge

27 Dated: March 11, 2025.
28