	1 2 3 4 5 6	KIRK B. LENHARD, ESQ., Nevada Bar No. 14: klenhard@bhfs.com TAMARA BEATTY PETERSON, ESQ., Nevad tpeterson@bhfs.com BROWNSTEIN HYATT FARBER SCHRECK, 100 North City Parkway, Suite 1600 Las Vegas, Nevada 89106 Telephone: 702.382.2101 Facsimile: 702.382.8135  Attorneys for Defendants City of Henderson, Nev Walker, and Christopher Worley	a Bar No. 5218 LLP
	8	UNITED STATES 1	DISTRICT COURT
	9	DISTRICT OF NEVADA	
(702) 382-2101	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	ANTHONY MITCHELL, LINDA MITCHELL, and MICHAEL MITCHELL  Plaintiffs,  v.  CITY OF HENDERSON, NEVADA; JUTTA CHAMBERS, individually and in her official capacity as Chief of the Henderson Police Department, GARRETT POINIER, RONALD FEOLA, RAMONA WALLS, ANGELA WALKER, and CHRISTOPHER WORLEY, individually and in their official capacities as Henderson police officers; CITY OF NORTH LAS VEGAS, NEVADA; JOSEPH CHRONISTER, individually and in his official capacity as Chief of the North Las Vegas Police Department; MICHAEL WALLER, DREW ALBERS, DAVID CAWTHORN, ERIC ROCKWELL, AND /F/N/U SNYDER, individually and in their official capacities as North Las Vegas police officers; JANETTE R. REYES-SPEER; DOE individuals 1-40, jointly and severally; and ROE CORPORATIONS 1- 40 jointly and severally,  Defendants.	Case No.: 2:13-cv-01154-APG-CWH  STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES FOR REQUESTS FOR ADMISSIONS AND INTERROGATORIES  (First Request)
	25	Pursuant to Local Rule 6-1 and Fed. R.	Civ. P. 29, Plaintiffs Anthony Mitchell, Linda
	26	Mitchell, and Michael Mitchell (collectively	"Plaintiffs"), Defendants City of Henderson,
	27	Nevada, Angela Walker, and Christopher Wor	ley (collectively, the "Henderson Defendants"),
	28		

and Defendants City of North Las Vegas, Joseph Chronister, Michael Waller, Drew Albers				
David Cawthorn, Eric Rockwell, and Travis Snyder (collectively, the "North Las Vegas				
Defendants"), by and through their undersigned counsel of record, hereby stipulate and agree				
subject to this Court's approval, as follows:				
(1) the December 28, 2015, deadline for the Henderson Defendants to respond to Plaintif				

- er 28, 2015, deadline for the Henderson Defendants to respond to Anthony Mitchell's First Set of Interrogatories No. 1-25 (propounded on November 23, 2015) shall be extended thirty (30) days to January 27, 2016;
- (2) the December 28, 2015, deadline for the North Las Vegas Defendants to respond to Plaintiff Anthony Mitchell's First Set of Interrogatories No. 1-25 (propounded on November 23, 2015) shall be extended thirty (30) days to January 27, 2016;
- (3) the December 28, 2015, deadline for the Henderson Defendants to respond to Plaintiff Anthony Mitchell's First Set of Requests for Admissions No. 1-77 (propounded on November 23, 2015) shall be extended thirty (30) days to January 27, 2016; and
- (4) the December 28, 2015, deadline for the North Las Vegas Defendants to respond to Plaintiff Anthony Mitchell's First Set of Requests for Admissions No. 1-73 (propounded on November 23, 2015) shall be extended thirty (30) days to January 27, 2016.

None of the deadlines in the current Scheduling Order are affected by this Stipulation.

. . .

1	WHEREFORE, the parties respectfully request that this Court enter an Order extending	
2	the discovery deadlines as set forth above.	
3	DATED this 23 <sup>rd</sup> day of December, 2015.	
4	BROWNSTEIN HYATT FARBER SCHRECK, COFER, GELLER & DURHAM, LLC LLP	
5		
6	By: /s/ Tamara Beatty Peterson  KIRK B. LENHARD, ESQ.  Novada Par No. 1427  By: /s/ Frank H. Cofer  BENJAMIN C. DURHAM, ESQ.  Novada Par No. 7684	
7	Nevada Bar No. 1437 Nevada Bar No. 7684 TAMARA BEATTY PETERSON, ESQ. FRANK H. COFER, III, ESQ.	
8	Nevada Bar No. 5218 SCOTT M. SCHOENWALD, ESQ. Nevada Bar No. 11362 COFER, GELLER & DURHAM, LLC	
9	Nevada Bar No. 5484 100 North City Parkway, Suite 1600 Las Vegas, Nevada 89106  Attorneys for Plaintiffs	
10	Attorneys for Defendants	
11	City of Henderson, Nevada, Jutta Chambers, Garrett Poinier, Ronald Feola, Ramona Walls,	
12	Angela Walter, Christopher Worley, and Janette R. Reyes-Speer	
13	LEWIS BRISBOIS BISGAARD & SMITH	
14		
15	By: <u>/s/ Robert W. Freeman, Jr.</u> ROBERT W. FREEMAN, JR. Nevada Bar No. 3062	
16	6385 S. Rainbow, Suite 600	
17	Las Vegas, NV 89118 Attorneys for Defendants City of North Las Vegas, Joseph Chronister, Sergeant Michael	
18	Waller, Drew Albers, David Cawthorn, Eric	
19	Rockwell and Travis Snyder	
20	IT IS SO ORDERED.	
21		
22	Cus H	
23	UNITED STATES MAGISTRATE JUDGE	
24	DATED: December 23, 2015	
25		
26		
27		
28		