



Strother et al v. Nye County

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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

1 of 2 Brenoch R. Wirthlin, Esq. Nevada Bar No. 10282 HUTCHISON & STEFFEN, PLLC Peccole Professional Plaza 10080 Alta Drive No. 200 Las Vegas, Nevada 89145 Phone: (702) 385-2500 Fax: (702) 385-2086 email: bwirthlin@hutchlegal.com P. Sterling Kerr, Esq. Nevada Bar No. 3978 George E. Robinson, Esq. Nevada Bar No. 9667 KERR SIMPSON ATTORNEYS AT LAW 2900 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 Phone: 702.451.2055 Fax: 702.451.2077 sterling@kerrsimpsonlaw.com george@kerrsimpsonlaw.com Michael M. DeLee, Esq. Nevada Bar No. 011948 DELEE LAW OFFICES, LLC 18 Power Line Rd. Amargosa Valley, NV 89020 Phone: 775-372-1999 Fax: 775-372-1234 michael@deleelaw.com Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA ARCADIA ELITE LLC, MICHELLE LYNN STROTHER, an individual;
and ROBERT JAMES HUTCHISON, an individual

Plaintiffs, v. NYE COUNTY, a political subdivision of the State of Nevada,

Defendant.

Case No. 2:23-cv-947 – GMN-NJK

PROPOSED ORDER EXTENDING TIME TO OPPOSE MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT 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

2 of 2 The parties hereto, by and through their respective counsel of record, hereby stipulate that the time for Plaintiffs to respond to Defendant's motion to dismiss Plaintiffs' First Amended Complaint (Document 41), shall be extended for two weeks, until December 11, 2023, with Defendant's time to reply extended until December 22, 2023. The parties make this request because the current deadline for Plaintiffs' response to the motion to dismiss is the Monday following the Thanksgiving holiday. This is the first request to extend time related to this motion to dismiss Plaintiffs' First Amended Complaint.

HUTCHISON & STEFFEN, PLLC /s/ Brenoch R. Wirthlin Brenoch R. Wirthlin, Esq. Peccole



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Professional Plaza 10080 Alta Drive No. 200 Las Vegas, Nevada 89145

/s/ Michael M. DeLee _____ Michael M. DeLee, Esq. DELEE LAW OFFICES, LLC 18 Power Line Rd. Amargosa Valley, NV 89020 Attorneys for Plaintiffs, Arcadia Elite LLC, Michelle Lynn Strother and Robert James Hutchison

MARQUIS AURBACH /s/ Heyden R. Smith Heyden R. Smith, Esq. Brian R. Hardy, Esq. 10001 Park Run Drive Las Vegas, NV 89145 Attorneys for Defendant, Nye County

/s/ George E. Robinson _____ George E. Robinson, Esq. KERR SIMPSON ATTORNEYS AT LAW 2900 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052

IT IS SO ORDERED:

_____ Gloria M. Navarro, District Judge UNITED STATES
DISTRICT COURT DATED: _____ November 22, 2023

1 Bobbie Benitez From: William R. Finizio Sent: Tuesday, November 21, 2023 3:48 PM To: Teresa Tokumon-Phillips Cc: Brenoch R. Wirthlin; Bobbie Benitez; Danielle Kelley Subject: FW: Arcadia v. Nye County [IWOV-iManage.FID1286866]

From: Hayden Smith

Sent: Monday, November 20, 2023 3:44 PM To: William R. Finizio ; Brenoch R. Wirthlin ; Brian R. Hardy Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley ; George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Thanks Bill. If you can also, please add my name under Brian's name in the signature block, then you can add my e- signature.

Hayden R. D. Smith, Esq. 10001 Park Run Drive Las Vegas, NV 89145 t | 702.207.6078 f | 702.382.5816 hsmith@maclaw.com maclaw.com Please consider the environment before printing this e-mail! DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach - Attorneys at Law From: William R. Finizio Sent: Monday, November 20, 2023 3:41 PM To: Hayden Smith ; Brenoch R. Wirthlin ; Brian R. Hardy Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley ; George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Thanks. Bill

2 From: Hayden Smith Sent: Monday, November 20, 2023 3:26 PM To: William R. Finizio ; Brenoch R.



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Wirthlin ; Brian R. Hardy Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley ; George Robinson
Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Bill, Thanks—per Brenoch’s
pervious email about giving us a similar extension, can we push our reply due date to Friday (12/22)?
Thanks,

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(702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender
and notify the sender immediately that you have received the communication in error. Thank you.
Marquis Aurbach - Attorneys at Law From: William R. Finizio Sent: Monday, November 20, 2023 3:06
PM To: Hayden Smith ; Brenoch R. Wirthlin ; Brian R. Hardy Cc: Michael M. DeLee ; Jon Linder ;
Danielle Kelley ; George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866]
All – Complaint. Please advise if it meets with your approval and authorize your signature. Thanks.
Bill From: Hayden Smith Sent: Wednesday, November 15, 2023 9:59 AM To: Brenoch R. Wirthlin ;
Brian R. Hardy Cc: Michael M. DeLee ; William R. Finizio ; Jon Linder

3 ; Danielle Kelley Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Hi Brenoch, I
spoke with Brian and we are agreeable to the extensions you proposed— Thanks,

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and notify the sender immediately that you have received the communication in error. Thank you.
Marquis Aurbach - Attorneys at Law From: Brenoch R. Wirthlin Sent: Tuesday, November 14, 2023
3:22 PM To: Brian R. Hardy ; Hayden Smith Cc: Michael M. DeLee ; William R. Finizio ; Jon Linder ;
Danielle Kelley Subject: Arcadia v. Nye County

We are, of course, agreeable to similar extension on your reply due date. Let Thanks

Brenoch R. Wirthlin Partner

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recipient is not authorized.

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Signature authorization 2 of 3 From: michael@deleelaw.com Sent: Tuesday, November 21, 2023 2:34 PM To: William R. Finizio ; Brenoch R. Wirthlin Cc: Jon Linder ; Danielle Kelley ; 'George Robinson' Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Yes. Thank you. --Michael From: William R. Finizio Sent: Tuesday, November 21, 2023 12:38 PM To: Brenoch R. Wirthlin Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley ; George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866]

Michael and George. Can you please confirm it is ok to affix your signatures to the proposed order? Thanks. Bill

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message ----- From: Hayden Smith Date: 11/20/23 3:44 PM (GMT-08:00) To: "William R. Finizio" , "Brenoch R. Wirthlin" , "Brian R. Hardy" Cc: "Michael M. DeLee" , Jon Linder , Danielle Kelley , George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866] Thanks Bill. If you can also, please add my name under Brian's name in the signature block, then you can add my e- signature.

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William R. Finizio Attorney

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Signature authorization 3 of 3. From: George Robinson Sent: Tuesday, November 21, 2023 12:58 PM To: William R. Finizio ; Brenoch R. Wirthlin Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley Subject: Re: Arcadia v. Nye County [IWOV-iManage.FID1286866] Yes. Esign for me. George Sent via the Samsung Galaxy S23+ 5G, an AT&T 5G smartphone Get Outlook for Android From: William R. Finizio Sent: Tuesday, November 21, 2023 12:37:43 PM To: Brenoch R. Wirthlin Cc: Michael M. DeLee ; Jon Linder ; Danielle Kelley ; George Robinson Subject: RE: Arcadia v. Nye County [IWOV-iManage.FID1286866]

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