

1 **MICHAEL MEE, ESQ.**  
2 Nevada Bar No. 13726  
3 400 S 4th St #500  
4 Las Vegas, NV 89101  
5 (702) 990-0190  
6 mmee@defenselawyervegas.com  
7 *Attorney for Plaintiff Jose DeCastro*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE  
14 DEPARTMENT; STATE OF NEVADA;  
15 BRANDEN BOURQUE; JASON TORREY; C.  
16 DINGLE; B. SORENSON; JESSE  
17 SANDOVAL; OFFICER DOOLITTLE and  
18 DOES 1 to 50, inclusive,

19 Defendants.

Case No.: 2:23-cv-00580-APG-EJY

**(FIRST) STIPULATION AND ORDER TO  
CONTINUE DEADLINE TO RESPOND  
TO DEFENDANTS' SECOND MOTION  
FOR SUMMARY JUDGMENT (ECF 102)**

20 **Certificate:** This Stipulation is Timely Filed.

21 COMES NOW, Plaintiff, JOSE DECASTRO, by and through his attorney of record,  
22 MICHAEL MEE, ESQ, and the Defendants LAS VEGAS METROPOLITAN POLICE  
23 DEPARTMENT; STATE OF NEVADA; BRANDEN BOURQUE; JASON TORREY; C.  
24 DINGLE; B. SORENSON; JESSE SANDOVAL; OFFICER DOOLITTLE, by and through  
25 counsel of record CRAIG R. ANDERSON, ESQ., who jointly hereby submit the following  
26 Stipulation to Extend Time for Plaintiff's Deadline to file a Response to Defendants' Second  
Motion for Summary Judgment (ECF 102).

The basis for this request is as follows:

- 1) No previous extension has been requested or granted. The initial deadline to respond was October 25, 2024.
- 2) During the three-week response period, counsel for Plaintiff was in a two-week trial on the matter of *Whipple v. Whipple* in the Eighth Judicial District Court, Clark County Nevada, which ended on October 18, 2024.
- 3) That counsel for Plaintiff requested that counsel for the Defendants agree to a one-week extension of time for this Response, and they agreed to that request on October 25, 2024.
- 4) The parties thus request that this Stipulation be approved and that an order be issued continuing formally extend time for an Opposition to be filed to said Motion through **November 1, 2024.**

DATED this 25<sup>th</sup> day of October, 2024

DATED this 25<sup>th</sup> day of October, 2025

/s/ Michael Mee, Esq.  
 MICHAEL MEE, ESQ.  
 Nevada Bar Number 13726  
 Counsel for Plaintiff

/s/ Craig R. Anderson, Esq.  
 CRAIG R, ANDERSON, ESQ.  
 Nevada Bar No. 6882  
 Counsel for Defendants

**ORDER**

IT IS HEREBY ORDERED that the Parties' Stipulation to Extend Time for the Filing of an Second Motion for Summary Judgment (ECF No. 102) is GRANTED and Plaintiff shall have through **November 1, 2024** to file an Opposition.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024

---

UNITED STATES DISTRICT COURT