

1 Case No. 18-trt-00001-1e

2 Dept. No. II

3
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11 Nevada State Bar No. 10319
12 316 California Ave #82
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14 775-453-0112
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16 *Attorneys for the Defendant*

17
18 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
19 **IN AND FOR STOREY COUNTY**

20 LANCE GILMAN,

21 Plaintiff(s),

22 vs.

23 SAM TOLL,

24 Defendant(s).
25 _____/

26
27 **MOTION FOR ORDER SHORTENING TIME TO RESPOND TO**
28 **MOTION FOR SUBMISSION OF MOTION TO DISMISS AND**
TERMINATION OF PROCEEDINGS

COMES NOW, SAM TOLL, ("Defendant" or "Toll"), by and through the

FILED

2019 FEB 25 AM 8:46

STOREY COUNTY CLERK

BY A. Duke
DEPUTY

1 undersigned counsel, and hereby files the following Motion for Order Shortening Time
2 against by Plaintiff LANCE GILMAN ("Plaintiff" or "Gilman") seeking an order from
3 Court shortening the time for the Plaintiff to respond to the Defendants underlying Motion
4 for Submission of Motion to Dismiss and Termination of Proceedings.
5

6
7 This Motion is based upon the following Memorandum of Points and Authorities,
8 the pleadings and papers filed herein, and any oral argument on this matter that the Court
9 should require.
10

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 Contemporaneous with this Motion, the Defendant has filed a Motion for
13 Submission of Motion to Dismiss and Termination of Proceedings. The Defendant
14 requests that the Court require the Plaintiff to file and serve an opposition to the underlying
15 Motion by March 6, 2019 and that the Defendant file and serve a response by March 11,
16 2019, and submit the Motion that same date.
17

18
19 Defendant submits that good cause exists under FJDCR 9 to shorten the time for the
20 Plaintiff to respond to the Motion so that the Court may have adequate time to consider the
21 Motion on the merits at the now scheduled March 15, 2019, evidentiary hearing.
22

23 In accordance with DCR 17, this Motion for an Order Shortening time is being
24 Served on counsel for the Plaintiff by same day via personal service.
25

26 WHEREFORE, the Plaintiff respectfully requests that the Court issue the Order
27 Shortening time, a draft of which is attached hereto as Exhibit 1.
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NRS 239B.030(4) AFFIRMATION

I certify that the attached filing includes no social security numbers or other personal information.

Respectfully submitted this February 25, 2019:

By: _____


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Attorneys for the Defendant

1
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3 **CERTIFICATE OF SERVICE**
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5
6 Pursuant to NRCP 5(b), I certify that on the date indicated below, I caused service
7 to be completed by:

8 _____ personally delivering;

9 delivery via Reno/Carson Messenger Service;

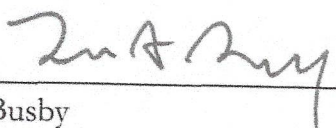
10 _____ sending via Federal Express (or other overnight delivery service);

11 _____ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,

12 _____ delivery via electronic means (fax, eflex, NEF, etc.)
13

14
15 a true and correct copy of the foregoing pleading addressed to:
16

17
18 GUS W. FLANGAS
19 JESSICA K. PETERSON
20 Flangas Dalacas Law Group
21 3275 South Jones Blvd. Suite 105
22 Las Vegas, NV 89164
23 702-307-9500
24 F - 702-382-9452

25 By: 
26 Luke Busby

27 Dated: 2-24-19
28

Exhibit List

1. Draft Order

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Exhibit 1

Exhibit 1

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6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR STOREY COUNTY**
8

9 LANCE GILMAN,

10 Plaintiff(s),

11 vs.

12 SAM TOLL,

13 Defendant(s).
14 _____/

15
16 **ORDER SHORTENING TIME**
17

18 Presently before the Court is Defendant's MOTION FOR ORDER SHORTENING
19 TIME TO RESPOND TO MOTION FOR SUBMISSION OF MOTION TO DISMISS
20 AND TERMINATION OF PROCEEDINGS ("the Motion") filed on February 25, 2019.

21 IT IS ORDERED that the Motion is GRANTED. The Plaintiff shall have until 5:00
22 p.m. on March 6, 2019, to file and serve any opposition to Plaintiff's Motion. The Defendant
23 shall any Reply and file a Request for Submission of the Motion by 12:00 p.m. on March 11,
24 2019.

25 Dated this ____ of February 2019.

26
27 _____
DISTRICT COURT JUDGE
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