

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA - SOUTHERN DIVISION OF NEVADA**

ANASTASIA STATHIS, )

Plaintiff, )

v. )

No: 2:09-cv-600

VENETIAN CASINO RESORT, LLC., )

a Nevada Limited Liability Company, )

d/b/a THE VENETIAN RESORT HOTEL )

& CASINO, VENETIAN OPERATING )

COMPANY, LLC., a Limited Liability )

Company, LAS VEGAS SANDS, INC., a )

Nevada Corporation, INTERFACE GROUP )

HOLDING COMPANY, INC., a Nevada )

Corporation, )

Defendants. )

Motion to Extend Discovery Schedule

**AGREED MOTION TO EXTEND DISCOVERY SCHEDULE**

NOW COMES the Plaintiff, ANASTASIA STATHIS, by and through her attorneys, ARGIONIS & ASSOCIATES and CAP & KUDLER as local counsel, and to move this Honorable Court to extend the current discovery schedule, and in support thereof, states as follows:

1. That on March 31, 2009, the subject complaint was filed with the United States District Court of Nevada, Southern Division.
2. That on August 7, 2009, a discovery plan / scheduling order was filed pursuant to Rule 16(b) of the Federal Rules of Civil Procedure.
3. Per said order, oral discovery was to be completed by July 12, 2010, including depositions of treating physicians and fact witnesses. Plaintiff expert witness disclosures are to be made by August 11, 2010 and said witnesses are to be deposed by September 10, 2010.

Defendant expert witnesses are to be disclosed by October 10, 2010 and said witnesses are to be deposed by November 9, 2010. Finally, any pre-trial conference is to commence on or before December 9, 2010 with trial to commence no later than sixty (60) days thereafter or by February 8, 2011.

4. Plaintiff seeks to extend the remaining discovery schedule by 90 days, which would change the schedule in the following manner:

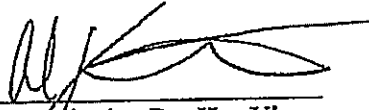
- a) All oral discovery, including but not limited to discovery depositions of fact witnesses and independent expert witnesses, included but not limited to medical treaters, should be completed within ninety days (90) after the initial deadline or by October 10, 2010.
- b) All expert witness disclosures shall be made by plaintiff within thirty (30) days of the oral discovery deadline or by November 9, 2010.
- c) All expert witnesses named by the plaintiff are to be deposed within thirty (30) days thereafter or by December 9, 2010.
- d) All expert witnesses disclosures shall be made by defendant within thirty (30) days of the plaintiff expert deposition deadline or by January 8, 2011.
- e) All expert witnesses named by the defendant are to be deposed within thirty (30) days thereafter or by February 7, 2011.
- f) Any pre-trial conference is to commence on or before March 9, 2011.
- g) Trial in this matter shall commence no later than sixty (60) days thereafter or by May 8, 2011.

5. All the fact witness depositions have commenced and there are a couple of treating depositions that still need to proceed before the parties are able to name their expert witnesses in this matter. Therefore, in order to be able to complete the treating physician depositions in a timely manner, an extension of the current discovery schedule is sought.

WHEREFORE, the Plaintiff, ANASTASIA STATHIS, by and through her attorneys,

ARGIONIS & ASSOCIATES and CAP & KUDLER as local counsel, request this Honorable Court to grant the Plaintiff's motion to extend the current discovery order, consistent with the new schedule laid out in the body of said motion and for whatever further relief this court deems proper.

DATED this 29th day of June, 2010



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Attorney No: 6236638



Donald Kudler  
Cap & Kudler  
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Las Vegas, NV 89102

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA - SOUTHERN DIVISION OF NEVADA**

ANASTASIA STATHIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	No: 2:09-cv-600
VENETIAN CASINO RESORT, LLC.,	)	
a Nevada Limited Liability Company,	)	
d/b/a THE VENETIAN RESORT HOTEL	)	
& CASINO, VENETIAN OPERATING )	)	
COMPANY, LLC., a Limited Liability	)	
Company, LAS VEGAS SANDS, INC., a	)	
Nevada Corporation, INTERFACE GROUP	)	
HOLDING COMPANY, INC., a Nevada	)	
Corpration,	)	
	)	
Defendants.	)	

**NOTICE OF FILING**

NOW COME the parties, by and through their attorneys, and for filing of their proposed Amended Discovery Plan/Scheduling Order to Extend the Discovery Schedule with Supporting Motion, states as follows:

**Attorneys for Plaintiff**

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**Attorney for Defendants**

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Michael Royal  
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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA - SOUTHERN DIVISION OF NEVADA**

ANASTASIA STATHIS,

Plaintiff,

v.

No: 2:09-cv-600

VENETIAN CASINO RESORT, LLC.,  
a Nevada Limited Liability Company,  
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Company, LAS VEGAS SANDS, INC., a  
Nevada Corporation, INTERFACE GROUP  
HOLDING COMPANY, INC., a Nevada  
Corporation,

Defendants.

Agreed Amended Discovery Order

**AGREED AMENDED DISCOVERY PLAN / SCHEDULING ORDER**

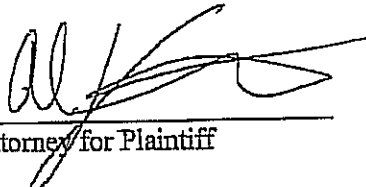
This matter coming to be heard upon agreed motion to amend discovery scheduling order, due notice being given and this Court being fully advised of the premises:

IT IS HEREBY ORDERED THAT:

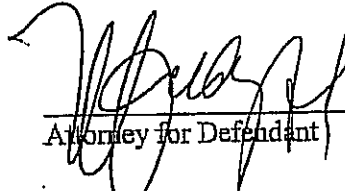
The amended discovery order per agreement of the parties is entered as follows:

- a) All oral discovery, including but not limited to discovery depositions of fact witnesses and independent expert witnesses, included but not limited to medical treaters, should be completed within ninety days (90) after the initial deadline or by October 10, 2010.
- b) All expert witness disclosures shall be made by plaintiff within thirty (30) days of the oral discovery deadline or by November 9, 2010.
- c) All expert witnesses named by the plaintiff are to be deposed within thirty (30) days thereafter or by December 9, 2010.
- d) All expert witnesses disclosures shall be made by defendant within thirty (30) days of the plaintiff expert deposition deadline or by January 8, 2011.
- e) All expert witnesses named by the defendant are to be deposed within thirty (30) days thereafter or by February 7, 2011.

- f) Any pre-trial conference is to commence on or before March 9, 2011.
- g) Trial in this matter shall commence no later than sixty (60) days thereafter or by May 8, 2011.

  
\_\_\_\_\_  
Attorney for Plaintiff  
  
6/29/10  
\_\_\_\_\_  
Date

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Tel: 312/782-4545

  
\_\_\_\_\_  
Attorney for Defendant  
  
6/29/10  
\_\_\_\_\_  
Date

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Royal Jones Miles  
Dunkley & Wilson  
1522 W. Warm Springs Rd.  
Henderson, NV 89014  
702/531-6777

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 7-2-10