

1 DARRELL D. DENNIS
 Nevada Bar No. 006618
 2 Darrell.Dennis@lewisbrisbois.com
 STEPHANIE GARABEDIAN
 3 Nevada Bar No. 009612
Stephanie.Garabedian@lewisbrisbois.com
 4 MICHAEL R. SMITH
 Nevada Bar No.12461
 5 LEWIS BRISBOIS BISGAARD & SMITH LLP
 6385 S. Rainbow Boulevard, Suite 600
 6 Las Vegas, Nevada 89118
 702.893.3383
 7 FAX: 702.893.3789
Attorneys for Defendant Eurpac Service, Inc.

8
 9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 EARLY MCGEE, individually,

12 Plaintiff,

13 vs.

14 EURPAC SERVICE, INC., a Connecticut
 15 Corporation; DOES I-X; and ROE
 CORPORATIONS I-X, inclusive,

16 Defendant.
 17

CASE NO.: 2:20-cv-00334-RFB-BNW

STIPULATION AND ORDER TO
 EXTEND DISCOVERY PLAN AND
 SCHEDULING ORDER

(Second Request)

18 Plaintiff, EARLY MCGEE, by and through her attorneys of record, ADAM SMITH
 19 LAW, and Defendant, EURPAC SERVICES, INC., by and through its attorneys of record
 20 LEWIS BRISBOIS BISGAARD & SMITH LLP, hereby request that the discovery deadlines
 21 in the previously filed DEFENDANT'S EMERGENCY MOTION TO EXTEND
 22 DISCOVERY DEADLINES [Doc.15], be extended by ninety (90) days, pursuant to FRCP
 23 29 and LR-26.4, as follows:

24 A. DISCOVERY WHICH HAS BEEN COMPLETED

25 The parties have conducted the following discovery to date:

- 26 1. Participation in the FRCP 26(f) Conference;
 27 2. Plaintiff has propounded Requests for Admissions, Request for
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- Production and Interrogatories and Defendant has answered;
- 3. Defendant has propounded Interrogatories, Requests for Production, and Requests for Admission. Plaintiff has answered;
- 4. Plaintiff has disclosed her Initial FRCP 26(a)(1) Disclosure of Witnesses and Documents;
- 5. Defendant has disclosed their Initial and First through Third Supplemental FRCP 26(a)(1) Disclosures;
- 6. Defendant deposed Plaintiff; and
- Defendant was able to obtain documents from Class Six through a Freedom of Information Act Request.

B. DISCOVERY WHICH REMAINS TO BE CONDUCTED

- 1. Deposition of Defendant;
- 2. Obtaining Plaintiff's Medical Records;
- 3. Depositions of Plaintiff's Medical Providers;
- 4. Initial Expert and Rebuttal Expert Disclosures;
- 5. Depositions of Plaintiff's Expert Witnesses;
- 6. Depositions of Defendant's Expert Witnesses;
- 7. Service of Subpoena to Nellis Airforce Base (currently closed due to COVID-19 Pandemic);
- 8. Site Inspection of the Nellis Airforce Base Exchange- Class Six;
- 9. Additional Written Discovery; and
- 10. Any Additional Discovery Deemed Necessary.

C. REASONS WHY THE PROPOSED DISCOVERY PLAN WAS NOT COMPLETED PRIOR TO THE EXPIRATION OF THE CURRENT DISCOVERY DEADLINE

The parties have been working diligently to complete discovery. Plaintiff has

1 responded to Defendant’s written discovery, and Defendant has attempted to request and
 2 subpoena Plaintiff’s medical records. Due to the restrictions imposed by the current
 3 COVID-19 Pandemic, Nellis Airforce Base is currently closed, and the parties have been
 4 unable to serve a subpoena for relevant information and/or schedule a site inspection.
 5 Defendant will obtain medical records and then parties will be able to schedule the
 6 deposition of Defendant. The parties will schedule the depositions of disclosed medical
 7 experts, and Plaintiff’s treating physicians. The parties respectfully request an extension.
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9 **D. PROPOSED PLAN FOR COMPLETING DISCOVERY**

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Deadline	October 26, 2020	January 25, 2021
Amend Pleading/Add Parties	July 28, 2020	October 26, 2020
Initial Expert Disclosures	August 26, 2020	November 24, 2020
Rebuttal Expert Disclosures	September 26, 2020	December 18, 2020
File Dispositive Motions	November 25, 2020	February 23, 2021
Pre-Trial Order	December 23, 2020	March 23, 2021

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19 **E. THE CURRENT TRIAL DATE**

20 This matter has not been scheduled for trial.

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E. NUMBER OF REQUESTS FOR EXTENSION

This is the second request to extend discovery deadlines and continue trial date.

DATED this 11th day of August, 2020.

ADAM SMITH LAW

By: /s/ Christian Miles

Adam D. Smith
Nevada Bar No. 9690
Christian A. Miles
Nevada Bar No. 13193
6130 Elton Avenue
Las Veags, Nevada 89107
Attorneys for Plaintiff

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Michael Smith

DARRELL D. DENNIS
Nevada Bar No. 006618
STEPHANIE GARABEDIAN
Nevada Bar No. 009612
MICHAEL R. SMITH
Nevada Bar No.12461
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Tel. 702.893.3383
Attorneys for Defendant Eurpac Service Inc.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

August 13, 2020

DATED: _____

Mercado, Gabriela

From: Smith, Michael R. (LV)
Sent: Tuesday, August 11, 2020 9:54 AM
To: Mercado, Gabriela
Subject: FW: Mcgee v. Eurpac - Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents
Attachments: McGee - Stipulation and Order to Extend Discovery Plan & Scheduling Order (2nd Request) 08.10.20 4851-7588-6535 v.1.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Follow-up w/Atty.

Can you help with this?

Michael Smith
Attorney
Las Vegas Rainbow
702.830.9017 or x7029017

From: Garabedian, Stephanie
Sent: Tuesday, August 11, 2020 9:52 AM
To: Smith, Michael R. (LV) <Michael.R.Smith@lewisbrisbois.com>; Quintana, Lucille <Lucille.Quintana@lewisbrisbois.com>
Subject: FW: Mcgee v. Eurpac - Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents

Lucille, please file the attached Stip. OC's permission is below.

Stephanie Garabedian
Partner
Las Vegas Rainbow
702.693.4379 or x7024379

From: Christian Miles <christian@adamsmithlaw.com>
Sent: Tuesday, August 11, 2020 9:02 AM
To: Garabedian, Stephanie <Stephanie.Garabedian@lewisbrisbois.com>; Quintana, Lucille <Lucille.Quintana@lewisbrisbois.com>
Cc: Smith, Michael R. (LV) <Michael.R.Smith@lewisbrisbois.com>; Grigg, Christopher <Christopher.Grigg@lewisbrisbois.com>; Lourdes Chappell <lourdes@adamsmithlaw.com>; Adam Smith <adam@adamsmithlaw.com>
Subject: [EXT] RE: Mcgee v. Eurpac - Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents

External Email

Good Morning Stephanie,

I have no objections to the SAO. You may use my e-signature to submit the document to the Court.

Best Regards,



Christian A. Miles
ADAM SMITH LAW
p: (702) 929-2289
f: (702) 960-4454
e: christian@adamsmithlaw.com
6130 Elton Ave., Las Vegas, NV 89107
www.adamsmithlaw.com

From: Garabedian, Stephanie <Stephanie.Garabedian@lewisbrisbois.com>
Sent: Monday, August 10, 2020 5:17 PM
To: Quintana, Lucille <Lucille.Quintana@lewisbrisbois.com>; Christian Miles <christian@adamsmithlaw.com>
Cc: Smith, Michael R. (LV) <Michael.R.Smith@lewisbrisbois.com>; Grigg, Christopher <Christopher.Grigg@lewisbrisbois.com>; Lourdes Chappell <lourdes@adamsmithlaw.com>
Subject: RE: Mcgee v. Eurpac - Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents

Hi Christian,

Pursuant to your voicemail, please find attached our proposed SAO to extend discovery. Please let us know if you approve of the Stipulation or if you would like revisions.

Thank you,

Stephanie



Stephanie Garabedian
Partner
Stephanie.Garabedian@lewisbrisbois.com
T: 702.693.4379 F: 702.893.3789

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

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From: Quintana, Lucille
Sent: Thursday, July 9, 2020 4:46 PM
To: 'christian@adamsmithlaw.com' <christian@adamsmithlaw.com>; 'lourdes@adamsmithlaw.com' <lourdes@adamsmithlaw.com>
Cc: Garabedian, Stephanie <Stephanie.Garabedian@lewisbrisbois.com>; Smith, Michael R. (LV) <Michael.R.Smith@lewisbrisbois.com>; Grigg, Christopher <Christopher.Grigg@lewisbrisbois.com>

Subject: Mcgee v. Eurpac - Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents

Christian and Lourdes –

Please find attached Defendant's FRCP 26(a)(1)(C) Third Supplemental List of Witnesses and Disclosure of Documents.

Thank you,

Lucille



Lucille Quintana

Legal Secretary

6385 S. Rainbow Blvd.

Suite 600

Las Vegas, NV 89118

lucille.quintana@lewisbrisbois.com

Direct Dial: 702-693-4394

Main: 702-893-3383

Fax: 702-893-3789
