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2 District of Nevada
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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 George Harris,
10
11 Plaintiff,
12 v.
13 United States of America,
14 Defendant.

Case No. 2:22-cv-00022-JCM-VCF

Stipulation and Order to
Reschedule Hearing on Plaintiff's
Motion for a Protective Order (ECF
No. 20)

(First Request)

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16 The United States respectfully requests that the court reschedule the hearing on
17 Plaintiff's Motion for a Protective Order (ECF No. 20) set on August 21, 2023, at 2:00 p.m.,
18 as it conflicts with a pre-planned deposition of a non-party medical witness in this case that is
19 scheduled at the same date and time as the hearing. *See* Ex. A, Plaintiff's Notice of Video
20 Deposition. Plaintiff does not oppose this request.

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1 This request is submitted in good faith and not for purposes of undue delay.

2 Respectfully submitted this 9th day of August 2023.

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4 SIMON LAW

5 /s/ Benjamin J. Miller
6 BENJAMIN J. MILLER, ESQ.
7 Nevada Bar No. 10406
8 810 S. Casino Center Blvd.
9 Las Vegas, NV 89101
10 *Attorneys for Plaintiff*

JASON M. FRIERSON
United States Attorney

11 /s/ R. Thomas Colonna
12 R. THOMAS COLONNA
13 Assistant United States Attorney
14 *Attorneys for the United States*

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IT IS HEREBY ORDERED that the hearing scheduled for August 21, 2023, is RESCHEDULED to an in-person hearing at 10:00 AM, September 5, 2023, in Courtroom 3D.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 8-9-2023

EXHIBIT A

Plaintiff's Notice of Video Deposition

1 **DANIEL S. SIMON, ESQ.**
 Nevada Bar No. 4750
 2 **BENJAMIN J. MILLER, ESQ.**
 Nevada Bar No. 10406
 3 **ASHLEY M. FERREL, ESQ.**
 Nevada Bar No. 12207
 4 **SIMON LAW**
 810 S. Casino Center Blvd.
 Las Vegas, NV 89101
 6 Phone: (702) 364-1650
 Facsimile: (702) 364-1655
 7 Email: lawyers@simonlawlv.com
 8 *Attorneys for Plaintiff*

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

11
 12 GEORGE HARRIS,
 13 Plaintiff,
 14 vs.
 15 UNITED STATES OF AMERICA,
 16
 17 Defendant.

CASE NO.: 2:22-cv-00022-JCM-VCF

18
 19 **PLAINTIFF'S NOTICE OF VIDEO DEPOSITION**
 20 **TO MITCHELL HUMPRHEYS, MD**

21 **TO: MITCHELL HUMPHREYS, MD;**
Mayo Clinic Legal Department
 22 **200 First Street SW**
 23 **Rochester, MN 55905**

24 YOU WILL PLEASE TAKE NOTICE that on the 21st day of August, 2023, at 2:00 p.m.,
 25 Plaintiff will take the deposition of **MITCHELL HUMPHREYS, MD**. Said deposition will take
 26 place via video conference by appearing via web-based videoconferencing hosted by Oasis
 27 Reporting Services upon oral examination pursuant to FRCP 30, before an officer authorized by law
 28 to administer oaths. Participants may attend by appearing via web-based videoconferencing only.

SIMON LAW
 810 S. Casino Center Boulevard
 Las Vegas, Nevada 89101
 702-364-1650 • Fax 702-364-1655

CERTIFICATE OF MAILING

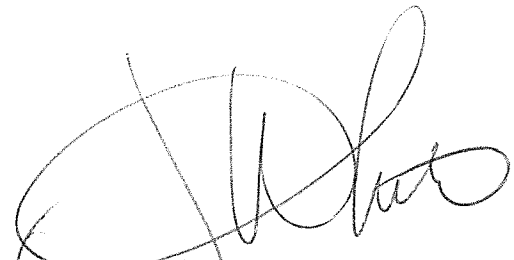
I hereby certify that on this 1st day of August, 2023, I served the above and foregoing

PLAINTIFF'S NOTICE OF VIDEO DEPOSITION TO MITCHELL HUMPHREYS, MD by

placing the original thereof in a sealed envelope, with first class postage fully prepaid thereon, and

depositing same in the United States Mail at Las Vegas, Nevada, addressed as follows:

JASON FRIERSON, ESQ.
Acting United States Attorney
District of Nevada
R. THOMAS COLONNA, ESQ.
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Attorneys for the United States



An employee of SIMON LAW

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