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38 *Las Vegas Sands Corp.,*

39 *Las Vegas Sands, LLC, and*

40 *Venetian Casino Resort, LLC*

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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 JUDY WONG, et al., ) Case No. 2:22-CV-00622-RFB-EJY  
4 )  
5 Plaintiff, ) **FOURTH STIPULATION AND**  
6 vs. ) **[PROPOSED] ORDER TO EXTEND**  
7 ) **DEADLINES; LR 26-3**  
8 LAS VEGAS SANDS CORP.; et al., ) Complaint filed: April 13, 2022  
9 ) Answer Filed: March 27, 2023  
10 ) Joint Pretrial Order Due: February 14, 2024  
11 ) Before the Honorable Richard F. Boulware, II  
12 )  
13 )  
14 )  
15 )

16 Pursuant to Local Rule LR 26-3, IT IS HEREBY STIPULATED AND AGREED by and  
17 among Defendants, LAS VEGAS SANDS CORP., LAS VEGAS SANDS, LLC, and VENETIAN  
18 CASINO RESORT, LLC ("Defendants"), by and through their counsel of record; Plaintiff, JUDY  
19 WONG by and through her counsel of record; and WILLIAM WONG in pro per, that the current  
20 discovery deadlines be extended in the above-referenced matter.

21 This is the fourth stipulation to extend discovery deadlines. An initial extension by  
22 stipulation was ordered on December 20, 2022. The first stipulation to extend discovery deadlines  
23 was necessary because Defendants had not received Plaintiff's medical records from her medical  
24 providers despite Plaintiff providing defendants with HIPAA authorizations, and despite Defendants  
25 exercising diligence. A second extension, pursuant to stipulation, was ordered on May 19, 2023. A  
third stipulated extension was ordered on July 31, 2023. The current fact discovery deadline is  
December 15, 2023.<sup>1</sup>

<sup>1</sup> The original fact discovery deadline was March 21, 2023 pursuant to the discovery plan approved by the Court on August 19, 2022, which was then extended to September 18, 2023 in connection with the second stipulation, which was then extended to December 15, 2023 by a third stipulation.

1 **Discovery That Has Already Been Completed**

2 On August 19, 2022, Defendants served their initial disclosure of documents and witnesses,  
3 pursuant to FRCP 26(a)(1). Defendants have served ten supplemental disclosures of documents and  
4 witnesses.

5 On August 19, 2022, Plaintiff, JUDY WONG served her initial disclosure of documents and  
6 witnesses, pursuant to FRCP 26(a)(1).

7 On September 30, 2022, Plaintiff, Judy Wong served written discovery requests on the  
8 Defendants. On November 11, 2022, Defendants served their responses to Plaintiff's written  
9 discovery requests.

10 On October 10, 2022, Plaintiff provided Defendants with HIPAA authorizations to obtain  
11 her medical records. Defendants have diligently attempted to obtain Plaintiff's records; however, as  
12 of December 14, 2022, Defendants had only received medical imaging films and reports, and  
13 Plaintiff's medical billing.

14 On October 25, 2022, Defendants provided Plaintiff with a proposed Stipulated Protective  
15 Order and Confidentiality Agreement, intended to protect certain documents to be disclosed to  
16 Plaintiff.

17 Plaintiff, JUDY WONG and Plaintiff WILLIAM WONG agreed to the proposed Stipulated  
18 Protective Order. The Stipulate Protective Order was signed by the Court on December 16, 2022.

19 On April 20, 2023, the parties exchanged initial expert disclosures/designations.

20 On July 18, 2023, Defendants took JUDY WONG'S deposition. On July 19, 2023,  
21 Defendants took WILLIAM WONG'S deposition.

22 On October 3, 2023, Defendants took JUDY WONG's treating medical provider's (Paul S.  
23 Hong, M.D.) deposition.  
24  
25

1 On October 11, 2023 Defendants received JUDY WONG'S Sutter Health physical therapy  
2 records dating back to 2014, via subpoena.

3 **Discovery That Remains to be Completed**

4 Defendants, exercising reasonable diligence, determined that they need JUDY WONG'S  
5 records dating back to 2007, particularly in connection with a 2007 MRI of her neck.<sup>2</sup>

6 Plaintiff has agreed to supplement her initial disclosures and responses to written discovery  
7 requests within thirty (30) days of the requested sixty-day extension.

8 Retrieval and review of JUDY WONG'S complete medical records are critical and  
9 necessary to all parties to supplement expert reports<sup>3</sup>, prepare for possible expert deposition(s), and  
10 for trial. Specifically, Defendants require additional time to receive JUDY WONG'S medical  
11 records dating back to 2007 so that they can provide the records to their expert who can then  
12 supplement his expert report.

13  
14 JUDY WONG also requires additional time to review and supplement her discovery  
15 responses and disclosures: specifically, by providing the required verification(s), providing damages  
16 calculations, and submitting a request to Sutter Health Group to disclose to Defendants' counsel  
17 records that date back to 2007. JUDY WONG ALSO requires additional time to review and  
18 potentially update her discovery responses without the Defendants filing a motion to compel. JUDY  
19 WONG is committed to completing her discovery obligations on or before January 15, 2024.

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20  
21 <sup>2</sup> On or about May 4, 2023, Plaintiff JUDY WONG provided additional medical release  
22 authorizations to Defendants in connection with her Sutter Group Sacramento medical provider  
23 records so that Defendants could obtain copies. Despite this, Sutter Group Sacramento did not  
24 promptly provide records to Defendants. JUDY WONG has experienced her own difficulty  
25 obtaining complete medical records from her own health group, despite her repeated requests.

<sup>3</sup> Instead of asking for a 90 day extension, the parties ask for a 60 day extension, with all sides  
committed to completing discovery within 60 days. However, in the event that cannot be  
accomplished by the parties, despite the exercise of reasonable diligence, it is possible the parties  
may seek another extension.

1 **REASONS FOR NOT COMPLETING DISCOVERY**

2 The parties require additional time to allow Defendants to obtain Plaintiff's relevant medical  
3 records given the prior history of difficulty of retrieving records from the Sacramento Sutter Health  
4 Group.

5 Given the size of this litigation and the issues at stake, the general outstanding procedural  
6 uncertainty, the need to get discovery from the parties that are directly relevant to the personal  
7 injury claims and defenses, and the inability to complete discovery despite diligence by the parties,  
8 the parties respectfully request that the Court order an extension of the existing deadlines, as  
9 proposed below.

10 **PROPOSED MODIFICATION**

11 Based on the foregoing, the parties jointly seek an order for an approximately 60-day  
12 extension of the current deadlines. Based on the foregoing, good cause supports an extension. The  
13 parties request extensions as follows:  
14

15 **Current Deadlines:**

16 Fact discovery cut-off date: December 15, 2023

17 Dispositive motions: January 15, 2024

18 Joint pretrial order: February 14, 2024

19 **Proposed New Deadlines:**

20 Fact discovery cut-off date: February 15, 2024

21 Dispositive motions: March 15, 2024

22 Joint pretrial order: April 15, 2024

23 ///

24 ///

25 ///

1 This request for an extension order is made by all parties in good faith and not for the  
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 Dated this 21<sup>st</sup> day of November 2023

Dated this 21<sup>st</sup> day of November 2023

5 /s/ David P. Pritchett  
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/s/ Manolo Olaso  
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*Attorneys for Plaintiff Judy Wong*  
*(e-signature expressly authorized on*  
*November 20, 2023)*

13 Dated this 21<sup>st</sup> day of November 2023

Dated this 21<sup>st</sup> day of November 2023

14 /s/ William S. Wong  
15 William S. Wong  
16 In Pro Per  
17 P.O. Box 466  
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19 *(e-signature expressly authorized on*  
20 *November 20, 2023)*

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Johnny L. Griffin, III and Manolo Olaso)  
*Attorneys for Plaintiff Judy Wong*  
*(e-signature expressly authorized on*  
*November 20, 2023)*

20 **IT IS SO ORDERED:**

21   
22 ELAYNA J. YOUCHAK  
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: November 21, 2023

25  
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