

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Gina M. Corena, Esq.**  
Nevada Bar No. 10330  
[gina@lawofficecorena.com](mailto:gina@lawofficecorena.com)  
**Mahna Pourshaban, Esq.**  
Nevada Bar No. 13743  
[mahna@lawofficecorena.com](mailto:mahna@lawofficecorena.com)  
**GINA CORENA & ASSOCIATES**  
300 S. Fourth Street, Suite 1250  
Las Vegas, Nevada 89101  
Telephone: (702) 680-1111  
Facsimile: (888) 987-6507  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TATIANA MARTINEZ SANTALLA, an individual,

Plaintiff,

v.

99 CENTS ONLY STORES LLC; KARLA LNU; DOE PROPERTY OWNER I-V; ROE PROPERTY OWNER I-V; DOE JANITORIAL EMPLOYEE I-V; ROE JANITORIAL COMPANY I-V; ROE MAINTENANCE COMPANY I-V; ROE PROPERTY MANAGEMENT COMPANY IV; DOE MAINTENANCE WORKER I-V; DOE PROPERTY MANAGER I-V; DOE EMPLOYEE I-V; ROE EMPLOYER I-V; and ROE COMPANIES I-V, inclusive, jointly and severally,

Defendants.

CASE NO.: 2:22-cv-00824-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[SECOND REQUEST]**

**SUBMITTED IN COMPLIANCE WITH  
LR26-1(e)**

The parties, by and through their counsel, and through their respective counsel, and pursuant to Local Rule 26-3, stipulate to modify their discovery plan as follows:

1. Plaintiff filed her Complaint in the Eighth Judicial District Court for Clark County, Nevada on April 11, 2022.
2. Defendants removed said case to the U.S. District Court for the District of Nevada on May 24, 2022 (ECF No. 1).





1           3.       The parties held their FRCP 26(f) conference on June 15, 2022, and in compliance  
2 with FRCP 26(f) and LR 26-1(e) filed their initial Stipulated Discovery Plan and Scheduling  
3 Order on June 15, 2022 (ECF No. 9).

4           4.       On June 17, 2022, the Magistrate Judge established a stipulated discovery plan  
5 (ECF No. 10).

6           5.       In compliance with Local Rule 26-3, the parties provide the following information  
7 regarding the discovery status:

8           a.       Discovery Completed, per LR 26-3(a):

- 9                   • The parties have exchanged initial disclosures, and supplements, of witnesses and  
10 documents, pursuant to Fed.R.Civ.P.26(a) between May 11, 2022 and January 5,  
11 2023.
- 12                   • Defendant has received signed medical authorizations, and has begun the process  
13 of independently obtaining Plaintiff's medical records arising out of the subject  
14 incident.
- 15                   • Defendant deposed Plaintiff Tatiana Martinez Santillan on September 22, 2022.
- 16                   • Plaintiff and Defendant have served and responded to written discovery requests.
- 17                   • Witness Lance Kimball has deposed on January 13, 2023.

18           b.       Discovery that remains to be completed:

19           Additional time is needed for Plaintiff to take the deposition of the FRCP 30(b)(6)  
20 designee for Defendant 99 Cent Stores; disclosure of expert witnesses and depositions of expert  
21 witnesses. Additional written discovery to Plaintiff and Defendant as deemed necessary  
22 following the remaining depositions. Plaintiff held a 2.34 conference call with Defense Counsel  
23 on the topics for FRCP 30(b)(6). At current Plaintiff is awaiting dates of availability for  
24 Defendants' witness(es) to notice the deposition of their FRCP 30(b)(6).

25           c.       Reasons why discovery was not completed: The parties' current Discovery Plan  
26 and Scheduling Order does not allow enough time to conduct further discovery due to the  
27 scheduling conflicts that have not allowed for the noticing of Defendant's FRCP 30(b)(6)  
28 witness(es). Additionally, Plaintiffs wish to conduct the in-person deposition of the FRCP

1 30(b)(6) designee for Defendant 99 Cents Store. Additional time for discovery is necessary to  
 2 avoid prejudice and to facilitate a fair and just investigation of Plaintiff’s claims against  
 3 Defendant. The Parties also intend to extend initial and rebuttal expert disclosures in hopes of  
 4 reaching a settlement.

5 d. Proposed schedule for completion of remaining discovery (extension of remaining  
 6 deadlines by approximately 90 days):

|  | <u>Old Deadlines</u> | <u>New Deadlines</u>      |
|--|----------------------|---------------------------|
| Amend Pleadings or Add Parties:              | 12/12/2022           | ---                       |
| Initial Expert Disclosure per FRCP 26(a)(2): | April 12, 2023       | <b>June 12, 2023</b>      |
| Rebuttal Expert Disclosure:                  | May 15, 2023         | <b>July 14, 2023</b>      |
| Close of Discovery:                          | June 12, 2023        | <b>August 11, 2023</b>    |
| Submit Dispositive Motions:                  | July 11, 2023        | <b>September 11, 2023</b> |
| Joint Pre-Trial Order:                       | August 10, 2023      | <b>October 9, 2023</b>    |

7  
8  
9  
10  
11  
12  
13  
14 WHEREFORE, the parties respectfully request that this Court extend the discovery period  
 15 by sixty (60) days from the current deadline as outlined in accordance with the proposed dates  
 16 above.

17 DATED this 7<sup>th</sup> day of April, 2023

DATED this 7<sup>th</sup> day of April, 2023

18 **GINA CORENA & ASSOCIATES**

**BRANDON | SMERBER LAW FIRM**

19  
20  
21 /s/ Mahna Pourshaban  
**Mahna Pourshaban, Esq.**  
 Nevada Bar No. 12743  
 300 S. Fourth Street, Suite 1250  
 Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

/s/ Homero Gonzalez  
**Homero Gonzalez Esq.**  
 Nevada Bar No. 15231  
 139 E. Warm Springs Road  
 Las Vegas, Nevada 89119  
*Attorney for Defendant 99 Cents Only Stores,  
 LLC*

GINA CORENA  
 & ASSOCIATES

CASE NO.: 2:22-cv-00824-CDS-DJA  
**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
**[SECOND REQUEST]**

**IT IS SO ORDERED:**

|  | <u>Old Deadlines</u> | <u>New Deadlines</u>      |
|--|----------------------|---------------------------|
| Amend Pleadings or Add Parties:              | 12/12/2022           | ---                       |
| Initial Expert Disclosure per FRCP 26(a)(2): | April 12, 2023       | <b>June 12, 2023</b>      |
| Rebuttal Expert Disclosure:                  | May 15, 2023         | <b>July 14, 2023</b>      |
| Close of Discovery:                          | June 12, 2023        | <b>August 11, 2023</b>    |
| Submit Dispositive Motions:                  | July 11, 2023        | <b>September 11, 2023</b> |
| Joint Pre-Trial Order:                       | August 10, 2023      | <b>October 9, 2023</b>    |



\_\_\_\_\_  
**UNITED STATES MAGISTRATE JUDGE**

DATED: April 11, 2023

GINA CORENA  
& ASSOCIATES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## Eva Rodriguez Dhimi

---

**From:** Homero Gonzalez <H.Gonzalez@bsnv.law>  
**Sent:** Monday, April 3, 2023 10:34 AM  
**To:** Eva Rodriguez Dhimi  
**Cc:** Meghan Allen; Jeffrey Orr; Kavita Narh; Mahna Pourshaban  
**Subject:** RE: Tatiana Martinez-Santalla v. 99 Cents

Good morning,

The only change is to the court on the first page. The one reflected is the Clark County District Court. You may affix my e-signature to the SAO to Extend Deadlines.

I am waiting on a response from my client as to the date for the 30(b)(6) depo(s). We will follow up today to see if we could get a response.

---

Warmest regards,

**HOMERO A. GONZALEZ, ESQ.**  
ASSOCIATE ATTORNEY  
BRANDON J SMERBER LAW FIRM  
139 EAST WARM SPRINGS ROAD  
LAS VEGAS, NEVADA 89119  
TEL. (702) 380-0007  
FAX. (702) 380-2964

---

**From:** Eva Rodriguez Dhimi <eva@lawofficecorena.com>  
**Sent:** Monday, April 3, 2023 10:12 AM  
**To:** Homero Gonzalez <H.Gonzalez@bsnv.law>  
**Cc:** Meghan Allen <M.Allen@bsnv.law>; Jeffrey Orr <j.orr@bsnv.law>; Kavita Narh <k.narh@bsnv.law>; Mahna Pourshaban <Mahna@lawofficecorena.com>  
**Subject:** RE: Tatiana Martinez-Santalla v. 99 Cents

Please see the attached SAO for your review.

Also, if you have dates of availability for your FRCP witness(es) then I can amend to add them to the SAO as well.

---

**From:** Homero Gonzalez <[H.Gonzalez@bsnv.law](mailto:H.Gonzalez@bsnv.law)>  
**Sent:** Thursday, March 30, 2023 3:09 PM  
**To:** Eva Rodriguez Dhimi <[eva@lawofficecorena.com](mailto:eva@lawofficecorena.com)>  
**Cc:** Meghan Allen <[M.Allen@bsnv.law](mailto:M.Allen@bsnv.law)>; Jeffrey Orr <[j.orr@bsnv.law](mailto:j.orr@bsnv.law)>; Kavita Narh <[k.narh@bsnv.law](mailto:k.narh@bsnv.law)>; Mahna Pourshaban <[Mahna@lawofficecorena.com](mailto:Mahna@lawofficecorena.com)>  
**Subject:** RE: Tatiana Martinez-Santalla v. 99 Cents

Defendant is agreeable to moving dates out by 30 days. We are still coordinating with our client for the 30(b)(6) deposition.

---

Warmest regards,

**HOMERO A. GONZALEZ, ESQ.**  
ASSOCIATE ATTORNEY

BRANDON | SMERBER LAW FIRM  
139 EAST WARM SPRINGS ROAD  
LAS VEGAS, NEVADA 89119  
TEL. (702) 380-0007  
FAX. (702) 380-2964

---

**From:** Eva Rodriguez Dhimi <[eva@lawofficecorena.com](mailto:eva@lawofficecorena.com)>  
**Sent:** Thursday, March 30, 2023 3:05 PM  
**To:** Kavita Narh <[k.narh@bsnv.law](mailto:k.narh@bsnv.law)>; Mahna Pourshaban <[Mahna@lawofficecorena.com](mailto:Mahna@lawofficecorena.com)>  
**Cc:** Meghan Allen <[M.Allen@bsnv.law](mailto:M.Allen@bsnv.law)>; Jeffrey Orr <[j.orr@bsnv.law](mailto:j.orr@bsnv.law)>; Homero Gonzalez <[H.Gonzalez@bsnv.law](mailto:H.Gonzalez@bsnv.law)>  
**Subject:** RE: Tatiana Martinez-Santalla v. 99 Cents

Thank you, this has been received.

We have upcoming discovery deadlines; do you expect that we will need to look at pushing dates back 30 days or so to allow for calendaring?

---

**From:** Kavita Narh <[k.narh@bsnv.law](mailto:k.narh@bsnv.law)>  
**Sent:** Thursday, March 30, 2023 3:01 PM  
**To:** Eva Rodriguez Dhimi <[eva@lawofficecorena.com](mailto:eva@lawofficecorena.com)>; Mahna Pourshaban <[Mahna@lawofficecorena.com](mailto:Mahna@lawofficecorena.com)>  
**Cc:** Meghan Allen <[M.Allen@bsnv.law](mailto:M.Allen@bsnv.law)>; Jeffrey Orr <[j.orr@bsnv.law](mailto:j.orr@bsnv.law)>; Homero Gonzalez <[H.Gonzalez@bsnv.law](mailto:H.Gonzalez@bsnv.law)>  
**Subject:** Tatiana Martinez-Santalla v. 99 Cents

Dear counsel,

Please see the attached.  
Final copy will follow via mail.

Sorry for the delay, but we're still working on our 30(b)(6) witness's availability.

Thank you,

Kavita Narh, Paralegal  
Brandon Smerber Law Firm  
139 East Warm Springs Road  
Las Vegas, Nevada 89119  
Direct: (702) 849-0895  
Tel: (702) 380-0007  
Fax: (702) 380-2964

The information contained in the electronic message is legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brandon Smerber Law Firm at (702) 380-0007 and permanently delete this communication immediately without making any copy or distribution.