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14 **ATTORNEYS FOR PLAINTIFFS**

15
 16 UNITED STATES DISTRICT COURT
 17 DISTRICT OF NEVADA, SOUTHERN DIVISION
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19 J.L., a minor by and through his
 Guardian Ad Litem MINA LILLY, T.A.,
 20 a minor by and through her Guardian
 Ad Litem SHWANA HARDY; and S.T., a
 21 minor by and through his Guardian Ad
 Litem JOANNE TAITANO,

22 Plaintiffs,

23 v.

24 CLARK COUNTY SCHOOL DISTRICT,
 25 MELISSA OLSZEWSKI, SHAWN
 HALLAND and DOES 1-50,

26 Defendants.
 27

Case No. 2:23-cv-00810-JCM-BNW

**STIPULATION AND [PROPOSED]
 ORDER TO MODIFY SCHEDULING
 ORDER**

[SECOND REQUEST]

**District Judge James C. Mahan
 Magistrate Judge Brenda Weksler**

Date Filed: May 24, 2023
 Trial Date: Unassigned

1 The Parties, through their undersigned counsel, hereby stipulate as follows:

2 **1. STATEMENT OF DISCOVERY COMPLETED**

3 The Parties submitted their stipulated discovery plan and scheduling order on
4 September 14, 2023 (Dkt. No. 25) and the Court entered its scheduling order on
5 September 15, 2023 (Dkt. No. 26). On December 29, 2023, the Court granted the Parties’
6 First Request to modify the scheduling order (Dkt. No. 33). The Parties have completed
7 the following discovery to date:

8 1. On September 28, 2023, Defendants Clark County School District
9 (“CCSD”) and Shawn Halland (collectively the “CCSD Defendants”) served their initial
10 disclosures.

11 2. On September 28, 2023, Plaintiffs served their initial disclosures.

12 3. On November 7, 2023, CCSD and Halland served their first supplemental
13 disclosures.

14 4. On November 22, 2023 CCSD served Interrogatories and Requests for
15 Production, Set One upon Plaintiffs J.L., T.A. and S.T.

16 5. On December 1, 2023, Plaintiffs served Interrogatories and Requests for
17 Production, Set One to Defendants CCSD and Halland.

18 6. On December 1, 2023, Plaintiffs noticed the depositions of Defendants
19 CCSD, Halland and Olszewski, as well as non-parties Daniel Ciarciaglini, Shirley
20 Diaz, Elaine Hansen, Natalie Holshue, James Kettner, Rebecca Lucero and Jodie
21 Swader.

22 7. On December 15, 2023, the CCSD Defendants requested dates for
23 depositions of Plaintiffs’ guardians.

24 8. On December 22, 2023, Plaintiffs served their responses to CCSD’s
25 Interrogatories and Requests for Production, Set One.

26 9. On January 16, 2024, CCSD served its responses to Plaintiffs’
27 Interrogatories and Requests for Production, Set One.

28 10. On January 19, 2024, CCSD and Halland served their second

1 supplemental disclosures.

2 **2. STATEMENT OF DISCOVERY THAT REMAINS TO BE**
3 **COMPLETED**

4 The following discovery remains to be completed:

- 5 1. Completion of all currently noticed depositions;
- 6 2. Additional depositions and written discovery, if needed based on
7 information or evidence gathered through the outstanding discovery and pending
8 depositions;
- 9 3. Disclosure of Experts, Expert Reports; and
- 10 4. Expert Discovery and Depositions.

11 **3. REASONS WHY DISCOVERY WILL NOT BE COMPLETED BY THE**
12 **CURRENT DISCOVERY CUTOFF**

13 Under the current deadlines, lay discovery closes on April 5, 2024. The Parties
14 need additional time to meet-and-confer regarding production of documents, to review
15 them when produced, and to take party depositions thereafter. The parties are also
16 engaged in ongoing settlement discussions and are hopeful that a resolution can be
17 reached. Accordingly, the Parties request a 90-day extension of all deadlines.

18 **4. PROPOSED SCHEDULE**

19 The Parties hereby stipulate and agree that the deadlines to complete discovery
20 as set forth in the Scheduling Order (Dkt. No. 33) shall be extended ninety (90) days
21 as follows:

22 1. **Lay Discovery Period:** The deadline to complete lay discovery shall be
23 extended from April 5, 2024 to **July 8, 2024.**

24 2. **Initial Expert Disclosure:** The deadline to file initial expert reports
25 shall be extended from May 6, 2024 to **August 5, 2024.**

26 3. **Rebuttal Expert Disclosure:** The deadline to file rebuttal expert
27 reports shall be extended from June 5, 2024 to **September 3, 2024.**

28 4. **Expert Discovery Period:** The deadline to complete expert discovery
shall be extended from July 8, 2024 to **October 7, 2024.**

1 Dated: March 15, 2024

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By /s/ Melissa Olszewski

MELISSA OLSZEWSKI

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Pro Se

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