

1 DENNIS M. PRINCE  
 Nevada Bar No. 5092  
 2 ANGELA M. LEE  
 Nevada Bar No. 14905  
**PRINCE LAW GROUP**  
 4 10801 W. Charleston Blvd., Suite 560  
 Las Vegas, NV 89148  
 5 Tel: 702-534-7600  
 6 Fax: 702-534-7601  
 E-Mail: [eservice@thedplg.com](mailto:eservice@thedplg.com)  
 7 *Attorneys for Plaintiff Tiffany Hedgepeth*

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

10  
 11 TIFFANY HEDGEPEETH, an individual,  
 12  
 Plaintiff,

13 vs.

14 MEIBORG BROS, INC., an Illinois  
 15 Corporation; MEIBORG, INC., an Illinois  
 16 Corporation; JAMES RAY COX, an  
 17 individual; DOES I through X, inclusive;  
 ROE BUSINESS ENTITIES I through X,  
 18 inclusive,  
 19 Defendants.

CASE NO.: 2:24-cv-00045-CDS-MDC

**JOINT DISCOVERY PLAN AND  
 [PROPOSED] SCHEDULING  
 ORDER**

**[SUBMITTED IN COMPLIANCE  
 WITH LR 26-1(B)]**

20  
 21 The parties, by and through their counsel of record, hereby submit the following  
 22 Joint Discovery Plan and [Proposed] Scheduling Order pursuant to Rule 26(f)(3) and LR  
 23 26-1:

24 A. Answer. Defendants MEIBORG BROS., INC., MEIBORG, INC., and JAMES RAY  
 25 COX answered to Plaintiffs TIFFANY HEDGEPEETH complaint on December 28,  
 26 2023.

27 B. Meeting. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(a), a meeting was held on  
 28 February 2, 2024 at 3:00 p.m. was attended by:



1 Plaintiff's counsel: Angela M. Lee of PRINCE LAW GROUP, appearing on behalf  
2 of Plaintiff TIFFANY HEDGEPEETH ("Plaintiff").

3 Defendant's counsel: Robert Thompson of RESNICK & LOUIS, P.C. appearing on  
4 behalf of Defendants MEIBORG BROS., INC., MEIBORG, INC., and JAMES RAY COX  
5 ("Defendants").

6 C. Initial Disclosures. Plaintiff produced her Initial Disclosures on **Thursday,**  
7 **February 15, 2024.** Defendants produced their Initial Disclosures on **Friday,**  
8 **February 16, 2024.**

9 D. Discovery Plan. Discovery does not need to be conducted in phases. The parties  
10 jointly propose to the Court the following discovery plan:

11 1. Subject of Discovery. The parties agree that the areas of discovery should  
12 include, but not be limited to: all claims and defenses allowed pursuant to the Federal  
13 Rules of Civil Procedure.

14 2. Discovery Cut-Off Date(s). Discovery will take 180 days, measured from the  
15 date the first defendant answers or appears, which means all discovery must be  
16 completed by **Tuesday, June 25, 2024.**

17 3. Amending the Pleadings and Adding Parties. The last date for filing  
18 motions to amend pleadings or to add parties shall not be later than 90 days prior to the  
19 close of discovery. In this action, the last date to file motions to amend the pleadings or  
20 add parties shall be **Wednesday, March 27, 2024.**

21 4. FRCP 26(a)(2) Disclosures (Experts). The last day to disclose expert  
22 witnesses shall be 60 days before the discovery cut-off date. In this action, the last date  
23 to disclose experts shall be **Friday, April 26, 2024.** The date for the disclosure of rebuttal  
24 expert witnesses shall be 30 days after the initial disclosure of experts. In this action, the  
25 last date to disclose rebuttal experts shall be **Monday, May 27, 2024 (actual due date**  
26 **is Sunday, May 26, 2024).**

27 ...

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1           5.     Dispositive Motions. The last date to file dispositive motions shall not be  
2 later than 30 days after the discovery cut-off date. In this action, the last date to file  
3 dispositive motions shall be **Thursday, July 25, 2024.**

4           6.     Joint Pretrial Order. The Joint Pretrial Order shall be filed no later than 30  
5 days after the date set for filing dispositive motions. In this action, the joint pretrial order  
6 shall be filed on or before **Monday, August 26, 2024 (actual due date is Saturday,**  
7 **August 24, 2024).** If dispositive motions are timely filed, the date for filing the Joint  
8 Pretrial Order shall be suspended.

9           7.     FRCP 26(a)(3) Disclosures. The disclosures required by FRCP 26(a)(3) and  
10 any objections thereto shall be included in the Joint Pretrial Order.

11          8.     Alternative-Dispute Resolution. The parties certify that they met and  
12 conferred about the possibility of using alternative-dispute resolution processes including  
13 mediation, arbitration, and if applicable, early neutral evaluation pursuant to LR 26-  
14 1(b)(7).

15          9.     Alternative Forms of Case Disposition. The parties certify that they  
16 considered and did not consent to trial by magistrate judge under 28 U.S.C. § 636(c) and  
17 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

18          10.    Electronic Evidence. The parties certify that they discussed whether they  
19 intend to present evidence in electronic format to jurors for the purposes of jury  
20 deliberations. The parties will enter into stipulations before trial about providing  
21 discovery in an electronic format compatible with the Court's electronic jury evidence  
22 display system.

23 E.     Consent to Service by Electronic Means through Electronic Mail. The undersigned,  
24 on behalf of Plaintiff and Defendants, hereby consent to service of documents by  
25 electronic means via electronic mail and/or facsimile and/or by U.S. Mail.

26               Documents served by electronic means must be transmitted to the following person  
27 at the e-mail address and/or facsimile number below:

28



1 1. Plaintiffs' Attorneys: Prince Law Group  
2 E-Service Address: [dprince@thedplg.com](mailto:dprince@thedplg.com), [alee@thedplg.com](mailto:alee@thedplg.com),  
3 [eservice@thedplg.com](mailto:eservice@thedplg.com)  
4 Facsimile Number: 702-534-7601

5 2. Defendant's Attorneys: Resnick & Louis, P.C.  
6 E-Service Address: [mroose@rlattorneys.com](mailto:mroose@rlattorneys.com), [rthompson@rlattorneys.com](mailto:rthompson@rlattorneys.com),  
7 [sjackson@rlattorneys.com](mailto:sjackson@rlattorneys.com), [balexander@rlattorneys.com](mailto:balexander@rlattorneys.com),  
8 [mmorrow@rlattorneys.com](mailto:mmorrow@rlattorneys.com)  
9 Facsimile Number: 702-997-3800

10 DATED: March 5, 2024

DATED: March 5, 2024

11 **PRINCE LAW GROUP**

**RESNICK & LOUIS, P.C.**

12 /s/ Dennis M. Prince

/s/ Robert L. Thompson

13 \_\_\_\_\_  
14 DENNIS M. PRINCE  
15 Nevada Bar No. 5092  
16 ANGELA M. LEE  
17 Nevada Bar No. 14905  
18 ANDREW R. BROWN  
19 Nevada Bar No. 15875  
10801 W. Charleston Blvd., Suite 560  
Las Vegas, NV 89148  
*Attorneys for Plaintiff*

\_\_\_\_\_

ROBERT L. THOMPSON  
Nevada Bar No. 9920  
MELISSA J. ROOSE  
Nevada Bar No. 7889  
8945 W. Russell Road. Ste. 330  
Las Vegas, NV 89148  
*Attorneys for Defendants*

20 **ORDER**

21 **IT IS SO ORDERED.**

- 22 1. The discovery cut-off shall be **Tuesday, June 25, 2024.**
- 23 2. **Amending the Pleadings and Adding Parties.** The last date for filing motions to  
24 amend pleadings or to add parties shall not be later than 90 days prior to the close of  
25 discovery. In this action, the last date to file motions to amend the pleadings or add  
26 parties shall be **Wednesday, March 27, 2024.**
- 27 3. **FRCP 26(a)(2) Disclosures (Experts).** The last day to disclose expert witnesses  
28 shall be 60 days before the discovery cut-off date. In this action, the last date to disclose



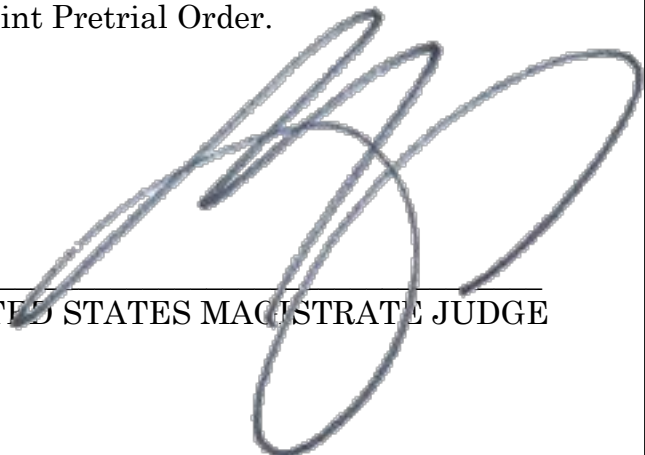
1 experts shall be **Friday, April 26, 2024**. The date for the disclosure of rebuttal expert  
2 witnesses shall be 30 days after the initial disclosure of experts. In this action, the last  
3 date to disclose rebuttal experts shall be **Monday, May 27, 2024**.

4 4. **Dispositive Motions**. The last date to file dispositive motions shall not be later than  
5 30 days after the discovery cut-off date. In this action, the last date to file dispositive  
6 motions shall be **Thursday, July 25, 2024**.

7 5. **Joint Pretrial Order**. The Joint Pretrial Order shall be filed no later than 30 days  
8 after the date set for filing dispositive motions. In this action, the joint pretrial order  
9 shall be filed on or before **Monday, August 26, 2024**.

10 6. **FRCP 26(a)(3) Disclosures**. The disclosures required by FRCP 26(a)(3) and any  
11 objections thereto shall be included in the Joint Pretrial Order.

12  
13 **DATED:** 3-7-24



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UNITED STATES MAGISTRATE JUDGE

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**RE: Hedgepeth v. Meiborg Bros, Inc., et. al.; Joint Status Report**

Robert Thompson &lt;rthompson@rlattorneys.com&gt;

Tue 3/5/2024 11:27 AM

To: Angela Lee &lt;alee@thedplg.com&gt;; Dennis Prince &lt;dprince@thedplg.com&gt;; Amy Larsen &lt;alarsen@thedplg.com&gt;; Jessica Mejia &lt;jmejia@thedplg.com&gt;; Amy Ebinger &lt;aebinger@thedplg.com&gt;

Cc: Mark Smith &lt;mrsmith@rlattorneys.com&gt;; Bonita Alexander &lt;balexander@rlattorneys.com&gt;; Autumn Humble &lt;ahumble@rlattorneys.com&gt;

Hi Angela,

It was a pleasure speaking with you today. You may affix my signature to the updated discovery plan.

Please also allow this email to confirm that your office granted us an extension to respond to your written discovery requests (Interrogatories, Requests for Production and Requests for Admissions) to April 5, 2024.

We also grant you request of an extension to respond to our written discovery to Friday, March 22, 2024.

Thank you again for your professional courtesy. Please feel free to contact us any time if you have any questions.

Thanks,

Bobby

Robert L. Thompson, Esq.  
8945 West Russell Road, Suite 330  
Las Vegas, Nevada 89148  
[rthompson@rlattorneys.com](mailto:rthompson@rlattorneys.com)  
Telephone: (702) 997-1026



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**From:** Angela Lee <alee@thedplg.com>

**Sent:** Monday, February 26, 2024 3:51 PM

**To:** Robert Thompson <rthompson@rlattorneys.com>; Dennis Prince <dprince@thedplg.com>; Amy Larsen <alarsen@thedplg.com>; Jessica Mejia <jmejia@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

**Cc:** Mark Smith <mrsmith@rlattorneys.com>; Bonita Alexander <balexander@rlattorneys.com>; Autumn Humble <ahumble@rlattorneys.com>

**Subject:** RE: Hedgepeth v. Meiborg Bros, Inc., et. al.; Joint Status Report

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Hi Robert,