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7 *Attorneys for Defendant,*  
 8 TARGET CORPORATION

9 UNITED STATES OF DISTRICT COURT  
 10 DISTRICT OF NEVADA

12 DENISE AMBROSI, individually, 13 Plaintiffs, 14 v. 15 TARGET CORPORATION d/b/a TARGET, a foreign corporation; DOES I-X; and ROE 16 BUSINESS ENTITIES XLXX, inclusive. 17 Defendants.	CASE NO.: 2:25-cv-00186-GMN-BNW  <b>STIPULATION AND ORDER TO          EXTEND DISCOVERY DEADLINES,          ONLY</b>  <b>[First Request]</b>
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 19 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, DENISE  
 20 AMBROSI (“Plaintiff”), by and through her attorney of record, BOHDEN G. COLE, ESQ. of the law  
 21 firm PACIFIC WEST INJURY LAW and Defendant, TARGET CORPORATION, by and through its  
 22 attorneys of record, LOREN S. YOUNG, ESQ. and JULIE A. WHITE, ESQ. of the law firm  
 23 LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a sixty (60) day  
 24 continuance of the current discovery deadlines to give the parties additional time to conduct discovery  
 25 and discuss possible resolution.

26 **I. DISCOVERY COMPLETED**

- 27 1. Plaintiff served her Initial Early Case Conference List of Witnesses and Documents on  
 28 February 20, 2025.

- 1 2. Defendant served its Initial Disclosure Pursuant to FRCP 26(a)(1) on March 18, 2025.
- 2 3. Defendant served its First Supplemental Disclosure on March 19, 2025.
- 3 4. Plaintiff served her First Supplemental Disclosure on April 18, 2025.
- 4 5. Defendant served Requests for Production and Interrogatories to Plaintiff on March 18,
- 5 2025; and
- 6 6. Plaintiff served her responses to Defendant's Requests for Production of Documents
- 7 and Interrogatories on April 18, 2025.

8 **II. DISCOVERY REMAINING TO BE COMPLETED**

- 9 1. Initial and Rebuttal expert disclosures
- 10 2. Deposition of Plaintiff
- 11 3. Depositions of percipient witnesses
- 12 4. Depositions of FRCP 30(b)(6) witnesses
- 13 5. Expert witness depositions
- 14 6. Additional written discovery as needed

15 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

16 This matter involves an alleged slip and fall incident. The parties have been working through  
17 discovery and handling conflicts as they arise. The parties have been working together to continue to  
18 push through discovery where possible, but additional time is necessary. The Parties have been  
19 actively participating in discovery and seek additional time for scheduling the depositions of percipient  
20 witnesses and Plaintiff's treating providers, obtaining medical records of the Plaintiff as it was learned  
21 there has been additional treatment during her deposition, as well as other discovery that may arise in  
22 the course of discovery. The Parties are acting in good faith, and the request is not intended to cause  
23 unnecessary delay or prejudice to any party. The parties anticipate no further extensions will be  
24 required and put forth that the additional time is necessary in order to complete the remaining  
25 discovery. The parties agree this request is not made for the purpose of delay, but to ensure a just  
26 adjudication of the case on the merits, and that neither party will be prejudiced by the requested  
27 extension. The parties will continue to work cooperatively with each other to complete discovery.

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1 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

2 It is hereby stipulated that the discovery cutoff deadline be extended for a period of sixty (60)  
3 days. If approved, the new discovery deadlines would be modified as follows:

4 <b>Event Deadline</b>	<b>Current Date</b>	<b>Proposed Date</b>
5 Close of Discovery	10/03/2025	<b>12/02/2025</b>
6 Motions to Amend Pleadings	07/03/2025	<b>09/03/2025</b>
7 Initial Expert Disclosures	08/04/2025	<b>10/03/2025</b>
8 Rebuttal Expert Disclosures	09/03/2025	<b>11/03/2025<sup>1</sup></b>
9 Dispositive Motions	11/03/2025	<b>01/02/2026<sup>2</sup></b>
10 Joint Pre-Trial Order	12/03/2025	<b>02/02/2026<sup>3</sup></b>

11 **IT IS SO STIPULATED AND AGREED.**

12 Dated: June 25, 2025

Dated: June 25, 2025

13 **LINCOLN, GUSTAFSON & CERCOS, LLP**

**PACIFIC WEST INJURY LAW**

14 /s/ Loren S. Young

/s/ Bohden G. Cole

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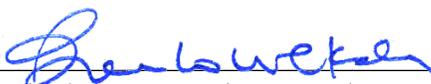
22 **TARGET CORPORATION**

Las Vegas, Nevada 89113

*Attorneys for Plaintiff, DENISE AMBROSI*

23 **ORDER**

24 **IT IS SO ORDERED.**

25 

United States Magistrate Judge

26 DATED: June 26, 2025

27 <sup>1</sup> Actual date is November 2, 2025, which is a Sunday.

28 <sup>2</sup> Actual date is January 1, 2026, which is a holiday.

<sup>3</sup> Actual date is February 2, 2026, which is a Sunday.