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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 WASSIM EL HADDAD, individually,

CASE No. 2:25-cv-01361-JAD-BNW

9 Plaintiffs,

**STIPULATION AND PROPOSED ORDER
 TO EXTEND DISCOVERY DEADLINES**

10 vs.

(FIRST REQUEST)

11 SAM'S WEST, INC. d/b/a SAM'S CLUB, a
 Foreign Corporation; M&D Group, LLC, a
 Nevada Limited Liability Company; DOE
 12 EMPLOYEES; and DOES I-X; and ROE
 BUSINESS ENTITIES XI-XX, inclusive.

13 Defendants.
 14

15 IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys
 16 of record, that the current discovery deadlines to be extended as indicated on page 3, pursuant to
 17 Local Rule 26-1(b) and 26-4.

18 **I.**

19 **DISCOVERY COMPLETED TO DATE**

- 20 1. The parties have conducted the FRCP 26.1 Early Case Conference.
- 21 2. Defendant produced its Lists of Witnesses and Documents on August 5, 2025,
- 22 3. Plaintiff produced his Lists of Witnesses and Documents on September 15, 2025.
- 23 4. Defendant propounded its First Set of Interrogatories (25 Interrogatories),
 24 Requests for Production of Documents (32 Requests), and Requests for Admissions (26
 25 Requests) to Plaintiff on September 15, 2025.
- 26 6. Plaintiff responded to First Set of Interrogatories (25 Interrogatories), Requests
 27 for Production of Documents (32 Requests), and Requests for Admissions (26 Requests) to
 28 Plaintiff.

- 1 7. Plaintiff served his initial Discover to Defendant on October 29, 2025.
- 2 8. Defendant responded to Plaintiff's Initial Discovery on December 29, 2025.
- 3 9. Rule 35 Examination of Plaintiff with Dr. Rimoldi on December 15, 2025.

4 **II.**
5 **DISCOVERY THAT REMAINS TO BE COMPLETED**

- 6 1. Inspection of the premises.
- 7 2. Deposition of Plaintiff.
- 8 3. Deposition of Defendant Walmart, Inc. 30(b)(6) witness(es).
- 9 4. Designation of Initial Experts.
- 10 5. Designation of Rebuttal Experts.
- 11 6. Deposition(s) of Plaintiff's treating physicians.
- 12 7. Deposition of other percipient witnesses.
- 13 8. Depositions of experts.
- 14 9. Additional written discovery (if necessary).
- 15 10. Any remaining discovery the parties deem relevant and necessary as discovery
16 continues.

17 **III.**
18 **WHY DISCOVERY CANNOT BE COMPLETED WITHIN THE TIME PROVIDED BY**
19 **THE CURRENT SCHEDULING ORDER**

20 The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for
21 the following requested extension. This Request for an extension of time is not sought for any
22 improper purpose or for the purpose of delay. Good cause exists for the following reasons: a
23 brief extension is request to disclose initial experts and rebuttal expert. The Rule 35
24 Examination of Plaintiff occurred on December 15, 2025 with Dr. Rimoldi. Defense's counsel
25 was informed today January 2, 2026 that the report of Dr. Rimoldi will be ready by January 9,
26 2026 since the transcriptionist is out of the office until January 9, 2026 due to the Holidays.
27 Counsel have conferred via text message today and agreed to the brief extension subject to the
28 approval of this court.

Extension or Modification of The Discovery Plan and Scheduling Order.

LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before the expiration of a deadline, the parties must show a good cause exist. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect. **Good cause exists for the following reasons: a brief extension is requested to disclose initial and rebuttal experts. The Rule 35 Examination of Plaintiff occurred on December 15, 2025 with Dr. Rimoldi. Defense’s counsel was informed that the report will be ready by January 9, 2026 since the transcriptionist was out of the office until January 9, 2026 due to the Holidays. Counsel have conferred via text message today and agreed to the brief extension subject to the approval of this court.**

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

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	December 4, 2025	December 4, 2025
Initial Expert Disclosures	January 3, 2026	January 9, 2026
All Rebuttal Expert Disclosures	February 3, 2026	February 9, 2026
Discovery Cut-Off Date	March 4, 2026	March 4, 2026
Dispositive Motions	April 3, 2026	April 3, 2026
Pretrial Order	May 3, 2026	May 3, 2026

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The parties represent this Stipulation is sought in good faith and with excusable neglect and not interposed for delay or any other improper purpose.

Dated this 2nd day of January, 2026.

Dated this 2nd day of January, 2026.

TYSON & MENDES LLP

PACIFIC WEST INJURY LAW

/s/ Griffith H. Hayes

/s/

Griffith Hayes
GRIFFITH H. HAYES
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Nevada Bar No. 13348
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5940 South Rainbow Boulevard
Las Vegas, NV 89118
Attorneys for Plaintiff

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED January 5, 2026

Misty Pettiford

From: Stefania Rota Scalabrini
Sent: Friday, January 2, 2026 2:28 PM
To: Misty Pettiford
Cc: Griffith Hayes; Daniela De La Torre Montero
Subject: FW: El Hadadd v. Sam's West (25-2693) FRE 408
Attachments: SAO First Request (A0374270xDBB43).DOCX

Hi Misty,

Can you please file this SAO this afternoon? Thank you !!



Stefania Rota Scalabrini Paralegal

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From: Kirill Mikhaylov, Esq. <Kirill@PacificWestinjury.com>
Sent: Friday, January 2, 2026 2:27 PM
To: Stefania Rota Scalabrini <SRotascalabrini@tysonmendes.com>
Cc: Griffith Hayes <ghayes@tysonmendes.com>; Michelle Zuniga <Michelle@PacificWestinjury.com>; Claudia Corral <Claudia@PacificWestinjury.com>
Subject: Re: El Hadadd v. Sam's West (25-2693) FRE 408

You may affix my electronic signature

On Jan 2, 2026, at 5:16 PM, Stefania Rota Scalabrini
<SRotascalabrini@tysonmendes.com> wrote:

Thank you Mr. Mikhaylov.

We have prepared a Stipulation extending discovery pertaining to experts only. If no revisions are needed, please let us know if we may affix your signature. Thank you.

<image001.png>

Stefania Rota Scalabrini

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<image002.png>

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From: Kirill Mikhaylov, Esq. <Kirill@PacificWestinjury.com>

Sent: Friday, January 2, 2026 2:11 PM

To: Stefania Rota Scalabrini <SRotascalabrini@tysonmendes.com>

Cc: Griffith Hayes <ghayes@tysonmendes.com>; Michelle Zuniga <Michelle@PacificWestinjury.com>;
Claudia Corral <Claudia@PacificWestinjury.com>

Subject: Re: El Hadadd v. Sam's West (25-2693) FRE 408

Good Afternoon,

Per my messages with Griff, the scheduling order states that January 3, 2026, is the initial expert disclosure deadline, which is tomorrow but we will be treating Monday as the initial expert disclosure deadline.

We're in agreement with extension for Rimoldi's report to January 9, 2026.

Thank you.

On Jan 2, 2026, at 2:33 PM, Stefania Rota Scalabrini
<SRotascalabrini@tysonmendes.com> wrote: