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7 *Attorneys for Venetian Casino Resort*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

11 CHRISTI M. LONG, an individual,

12 Plaintiff,

13 vs.

14 THE VENETIAN CASINO RESORT, a  
 Domestic Limited Liability Company; DOE  
 15 INDIVIDUALS 1 through X inclusive; ROE  
 16 BUSINESSES OR GOVERNMENTAL  
 ENTITIES 1 through X, inclusive,

17 Defendants.

Case No. 2:09-cv-01177-LDG-LRL

**STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER**

19 Plaintiff Christie M. Long and Defendant The Venetian Casino Resort, by and through  
 20 their undersigned attorneys hereby submit their Stipulated Discovery Plan and Scheduling Order  
 21 in compliance with LR 26-1.

- 22 1. Initial Rule 26(f) Conference was held on August 11, 2010.
- 23 2. Exchange of Initial Disclosures – Defendant Venetian Casino Resort exchanged  
 24 its initial disclosures on August 13, 2010. Plaintiff will exchange her initial disclosures or before  
 December 10, 2010,

1           3.       Subject of Discovery: Discovery will be conducted regarding liability and  
2 damages, if any, as alleged in Plaintiff's Complaint.

3           4.       Disclosure of Electronically Stored Information: Electronically stored  
4 information will be exchanged by the parties in paper or in .pdf format. However, the parties are  
5 not waiving, and expressly reserve, the right to see production of electronically stored information  
6 in its native file format and/or seek metadata associated with electronic files.

7           5.       Protection of Privileged/Trial Preparation Material: Currently, there are no issues  
8 related to claims of privilege or of protection as trial preparation material. The parties have not  
9 reached any agreement on a procedure to assert such claims after production.

10          6.       Discovery Deadline – Each party anticipates conducting discovery permissible  
11 under the Federal Rules of Civil Procedure 26(b). The parties have agreed that the date by which  
12 to complete discovery will be **March 18, 2010**.

13          7.       Amend Pleadings and Add Parties: Pursuant to LR 26-1(e)(2), motions to amend  
14 the pleadings or to add parties shall be filed and served on or before **December 17, 2010**, 90 days  
15 prior to the discovery deadline.

16          8.       Interim Status Report: **January 14, 2011** is the last Court day to submit a joint  
17 interim status report, 60-days prior to the discovery deadline pursuant to LR 26-3.

18          9.       Expert Witness Information – **January 14, 2011** is the last day for the parties to  
19 exchange expert witness information and reports. **February 14, 2010** is the last day for the  
20 parties to exchange rebuttal witness information, 30 days after the initial disclosure of experts  
21 pursuant to LR 26-1(e)(3). The requirements of FRCP 26(a)(2)(B) shall apply to any such  
22 disclosures.

23          11.       Extending Discovery – Any motions or stipulations to extend discovery must be  
24 received by the Court by **February 25, 2011**.

          12.       Dispositive Motions – dispositive motions must be filed on or before **April 18,**  
**2011**, 30 days after the discovery deadline pursuant to LR 26-1(e)(4).

          13.       Summary Judgment – Unless a different time is set by the Court, any motion for

1 summary judgment must be filed on or before **April 18, 2011**.

2 14. Motions in Limine – Pursuant to LR 16-3, motions *in Limine* may be filed at any  
3 time up to thirty days before trial.

4 15. Joint Pretrial Order – The joint pretrial order required by LR 26-1(e)(5) shall be  
5 filed by the parties no later than **May 18, 2011**, thirty days after the deadline for filing dispositive  
6 motions. In the event dispositive motions are filed, the date for filing the joint pretrial order shall  
7 be suspended until thirty days after the decision of the dispositive motions or until further order of  
8 the Court as provided in LR 26-1(e)(5). The disclosures required by FRCP 26(a)(3), and any  
9 objections thereto, shall be included in the pretrial order as required by LR 26-1(e)(6).

10 Respectfully submitted this 1<sup>st</sup> day of December 2010.

11 FOX ROTHSCHILD LLP

LAW OFFICES OF PHILIP J. TRENCHAK

12  
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*Attorneys for Plaintiff Christi M. Long*

17 *Attorneys for Venetian Casino Resort*

18 **ORDER**

19 It is so ORDERED this 16<sup>th</sup> day of December 2010.

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21 \_\_\_\_\_  
22 United States Magistrate Judge