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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**
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10 KRISTINA WILDEVELD-CONEH,

Case No.: 2:10-cv-00983-RLH-PAL

11 Plaintiff,

12 v.

13 LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a Political Subdivision
 of the STATE OF NEVADA; Police Officer
 14 RICHARD DEAN GOSLAR, individually
 and as a police officer employed by the
 15 LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT; POLICE OFFICERS
 16 JOHN DOES I-XX; and JOHN DOES
 I-XX, inclusive,

17 Defendants.
 18 _____ /

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY**
AND OTHER DEADLINES
 20 **(Third Request)**

21 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record,
 22 hereby stipulate and request that this Court extend the discovery deadlines, including the current
 23 discovery cut-off of Monday, July 11, 2011, in the above-captioned case for and additional sixty (60)
 24 days, up to and including **Friday, September 9, 2011**. In addition, the parties request that the
 25 dispositive motions, and pretrial order deadlines be extended as outlined herein. In support of this
 26 Stipulation and Request, the parties state as follows:

27 **DISCOVERY COMPLETED TO DATE**

28 October 11, 2010, Las Vegas Metropolitan Police Department's Request for Admissions

1 to Plaintiff;
2 October 11, 2010, Las Vegas Metropolitan Police Department's Interrogatories to
3 Plaintiff;
4 October 11, 2010, Las Vegas Metropolitan Police Department's Request for Production of
5 Documents to Plaintiff;
6 October 11, 2010, Defendant Officer Richard Dean Goslar's Interrogatories to Plaintiff;
7 October 11, 2010 Defendant Officer Richard Dean Goslar's Request for Production of
8 Documents to Plaintiff;
9 November 15, 2010, Defendants' Fed. R. Civ. P. 26-1 Production and Witness Disclosure;
10 December 1, 2010, Plaintiff's Responses to Defendant Las Vegas Metropolitan Police
11 Department's First Set of Request for Admissions;
12 December 7, 2010, Plaintiff's FRCP 26.1 Initial Disclosure of Witnesses and Documents;
13 January 3, 2011, Plaintiff's Response to Las Vegas Metropolitan Police Department's
14 Interrogatories;
15 January 3, 2011, Plaintiff's Response to Las Vegas Metropolitan Police Department's
16 Request for Production of Documents;
17 January 3, 2011, Plaintiff's Response to Defendant Officer Richard Dean Goslar's
18 Interrogatories;
19 January 3, 2011, Plaintiff's Response to Defendant Officer Richard Dean Goslar's Request
20 for Production of Documents;
21 January 4, 2011, Plaintiff's First Supplement to FRCP 26.1 Initial Disclosure of Witnesses
22 and Documents;
23 January 6, 2011, Defendants' First Supplemental Disclosures;
24 January 19, 2011, Defendants noticed the deposition of Plaintiff;
25 January 28, 2011, Defendants amended the notice of deposition of Plaintiff;
26 February 2, 2011, Plaintiff noticed the deposition of witness, Larry Threadgill;
27 February 2, 2011, Plaintiff noticed the deposition of Defendant Officer Richard Dean
28 Goslar;

1 March 9, 2011, deposition of Plaintiff Kristina Wildeveld-Coneh, volume 1;
2 March 13, 2011, Defendant noticed the independent medical examination of Plaintiff;
3 March 14, 2011, Defendant noticed the continued deposition of Plaintiff;
4 March 15, 2011, Defendant vacated the notice of continued deposition of Plaintiff;
5 March 21, 2011, deposition of Defendant Officer Richard Dean Goslar;
6 March 23, 2011, deposition of witness Larry Threadgill;
7 April 19, 2011, Defendants' Second Supplemental Disclosure;
8 May 2, 2011, independent medical examination of Plaintiff;
9 May 6, 2011, Defendant amended the notice of continued deposition of Plaintiff;
10 May 12, 2011, Defendants' Designation of Expert Witnesses;
11 May 12, 2011, Plaintiff's Designation of Expert Witnesses;
12 May 24, 2011, Defendants' Third Supplemental Disclosure;
13 June 7, 2011, Defendants noticed the deposition of Stephanie Youngblood, D.C.
14 June 7, 2011, Defendants noticed the deposition of Terry Pfau, M.D.
15 June 16, 2011, Defendants vacated the deposition of Terry Pfau, M.D.

16 **DISCOVERY REMAINING**

17 Plaintiffs and Defendants need additional time to take expert depositions, witness/PMK
18 depositions, conduct discovery regarding the written discovery responses, and propound other
19 written discovery.

20 **WHY SUCH REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

21 The parties have been consistently keeping up on the deadlines as extended in Court
22 Docket #17. However, due to scheduling conflicts and unexpected circumstances, the parties
23 request that the discovery deadlines be extended to allow sufficient time for depositions to be set
24 and to propound any additional written discovery.

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1 **REASONS FOR REQUEST**

2 Due to the reasons set forth above, the parties have stipulated to the following proposed
3 schedule for the remaining discovery by sixty (60) days:

<u>Scheduled Event</u>	<u>Proposed Deadline</u>
Extension of Discovery Deadline	Friday, August 19, 2011
Discovery Cut-off	Friday, September 9, 2011
Dispositive Motions	Friday, October 7, 2011
Joint Pretrial Order	Friday, November 4, 2011

9 RESPECTFULLY SUBMITTED this 17th day of June, 2011.

10 POTTER LAW OFFICES

OLSON, CANNON, GROMLEY
& DESRUISSEAU

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17
18 **ORDER**

19 IT IS SO ORDERED.

20 Dated this