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

9 MARY GOODKIN,  
 10 Plaintiff,  
 11 vs.  
 12 PHILLIPS, HARPER & HARPER, LLC, a  
 limited liability company,  
 13 Defendant.  
 14

Case No: 2:10-CV-01223-JCJ-LRL

**PLAINTIFF’S PROPOSED DISCOVERY  
 PLAN AND SCHEDULING ORDER**

15 **SUBMITTED IN COMPLIANCE WITH LR 26-1(e)**

16 Plaintiff Mary Goodkin (“Plaintiff”), by and through her counsel of record file her  
 17 Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26 and Local Rule 26-1(e).<sup>1</sup>

18 **PLAINTIFF’S PROPOSED SCHEDULE**

19 **1. Fed. R. Civ. P. 26(a) Initial Disclosure:**

20 Plaintiff will exchange initial disclosures no later than **December 8, 2010**, or fourteen  
 21 days after Plaintiff submitted this report pursuant to LR 26-1(d). No changes are necessary in  
 22 the form or requirement for disclosures under Fed. R. Civ. P. 26(a).

23 **2. Estimate of Time Required for Discovery:**

24 Discovery will take **180 days** from September 15, 2010, which is the date Defendant  
 25 Phillips, Harper and Harper, LLC filed their Motion to Dismiss. All discovery must be  
 26 completed not later than **March 14, 2011**.

27 <sup>1</sup> Plaintiff made two attempts to contact Defendant to schedule the Fed. R. Civ. P. 26(f) conference, and  
 28 never received a response. Accordingly, Plaintiff files her own proposed plan and scheduling order.

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**3. Amending the Pleadings and Adding Parties:**

Unless stated herein or ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not be later than 90 days prior to the discovery cut-off date, and therefore not later than **December 14, 2010**.

**4. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

In accordance with Fed. R. Civ. P. 26(a)(2), disclosures identifying experts shall be made 60 days prior to the discovery cut-off date, and therefore not later than **January 13, 2010**, and disclosures of rebuttal experts shall be made 30 days after the initial disclosure of experts, and therefore not later than **February 12, 2010**.

**5. Dispositive Motions:**

The parties shall file dispositive motions 30 days after the discovery cut-off date, and therefore not later than **April 13, 2011**.

**6. Pretrial Order:**

If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore not later than **May 13, 2011**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court.

**7. Interim Status Reports:**

In accordance with Local Rule 26-3, an Interim Status Report will be filed by the parties with the Court 60 days prior to the discovery cut-off date, and therefore not later than **January 13, 2011**.

**8. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

In accordance with Local Rule 26-4, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than 20 days prior to the discovery cut-off date, and therefore not later than **February 22, 2011**.

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Dated: November 29<sup>th</sup> 2010.

Respectfully Submitted By:

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/s/ Andrew L. Rempfer, Esq.

COGBURN LAW OFFICES  
Andrew L. Rempfer, Esq.  
Attorneys for Plaintiff

**IT IS SO ORDERED.**



\_\_\_\_\_  
United States Magistrate Judge

DATED: 12-3-10