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

10 JACI FERRERYA,

11 Plaintiffs,

12 v.

13 TARGET CORPORATION, DOES 1 through 10, ;
14 and ROE ENTITIES 11-20, inclusive,

15 Defendants.

CASE NO: 2:10-cv-01870-KJD-LRL

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

SUBMITTED IN COMPLIANCE WITH
LOCAL RULE 26-1(e)

17 The above named parties, by and through their respective counsel of record, hereby submit
18 the Stipulated Discovery Plan and Scheduling Order pursuant to FRCP 26(f) and Local Rule 26-1(e)
19 for the Court's approval. This plan is submitted in compliance with the timing rules set forth in
20 LR26-1(e), measured from the date of the 26(f) conference, November 15, 2010.
21

22 **DISCOVERY PLAN**

23 1. The Plaintiff requested an additional fourteen (14) days from the date of the Rule
24 26(f) Conference in which to make her initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1).
25 Defendant's initial disclosure of documents and witnesses was made on November 15, 2010.
26 Plaintiff's initial disclosure of documents and witnesses shall be served no later than November 29,
27 2010.
28

1 2. The parties anticipate discovery may be needed on the issues of the respective
2 liability, if any, of the parties and the damages, if any, sustained by the Plaintiff. The parties do not
3 request that discovery be conducted in phases or be limited to or focused on particular issues.

4 3. The parties do not request that any changes be made to the limitations on discovery
5 under the Federal Rules of Civil Procedure or the Local Rules of Practice of the United States
6 District Court for the District of Nevada.

7 4. The parties do not request any other orders under the FRCP 26(c), FRCP 16(b) or
8 FRCP 16(c).
9

10 PROPOSED SCHEDULE

11 1. **Discovery Cut-Off Date:** Defendants filed their answer to Plaintiff's Complaint on
12 May 11, 2010. As stipulated between the parties, discovery will commence once the Discovery Plan
13 has been submitted to the court. All discovery must be completed not later than April 25, 2011.

14 2. **Amendment of Pleadings and Addition of Parties:** Unless otherwise stated herein
15 or ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not
16 be later than ninety (90) days prior to the discovery cut-off date and not later than January 25, 2011.

17 3. **Disclosure of Expert Witnesses:** In accordance with FRCP 26(a)(2), disclosures
18 identifying expert witnesses shall be made sixty (60) days prior to the discovery cut-off date and not
19 later than February 24, 2011, and disclosures respecting rebuttal experts shall be made thirty (30)
20 days after the disclosure of experts and not later than March 28, 2011.

21 4. **Interim Status Report:** On or before February 24, 2011, sixty (60) days prior to
22 the close of discovery, the parties shall file an Interim Status Report, as required by LR 26-3, stating
23 the time estimated for trial, three alternative dates for trial, and whether or not trial will be
24 proceeding or affected by substantive motions.

25 5. **Dispositive Motions:** The filing of Dispositive Motions shall not be later than thirty
26 (30) days after the discovery cut-off date and not later than May 25, 2011.

27 6. **Pretrial Order:** The Joint Pretrial Order shall be filed no later than thirty (30) days
28

1 after the date set for filing Dispositive Motions and not later than June 24, 2011. In the event
2 Dispositive Motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
3 thirty (30) days after the decision of the Dispositive Motions or further order of the court.

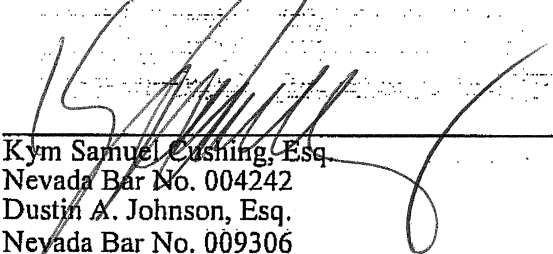
4 **7. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

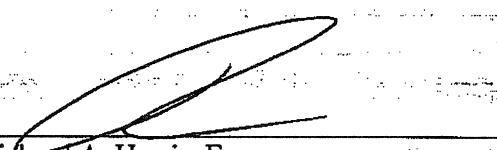
5 In accordance with LR 26-4, any stipulations or motion for modification or extension of this
6 discovery plan and scheduling order must be made no later than twenty (20) days before the
7 discovery cut-off date, or no later than April 5, 2011.

8
9 DATED this 15th day of December, 2010. DATED this 8th day of December 2010.

10 **WILSON, ELSER, MOSKOWITZ,**
11 **EDELMAN & DICKER LLP**

RICHARD HARRIS LAW FIRM

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IT IS SO ORDERED.

Dated this 16th day of December, 2010.



UNITED STATES MAGISTRATE JUDGE