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9 *Attorneys for Central Washington Asphalt,*
 10 *Inc., Donald Hannon, James Wentland*
and Jerry Goldsmith

11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE DISTRICT OF NEVADA**

13 WILLIAM TERRELL, Guardian Ad Litem for
 14 QUENTIN SLAGOWSKI, a minor, ANIKA
 SLAGOWSKI, a minor, and ROWAN
 15 SLAGOWSKI,

16 Plaintiffs,

17 vs.

18 CENTRAL WASHINGTON ASPHALT, INC.,
 DONALD HANNON, JAMES WENTLAND,
 19 JERRY GOLDSMITH and DOES 1 through 25,
 inclusive,

20 Defendants.

CASE NO. 2:11-cv-00142-APG-VCF

CONSOLIDATED WITH:
 CASE NO. 2:12-cv-01435-APG-VCF

CONSOLIDATED WITH:
 CASE NO. 2:12-cv-01475-APG-VCF

21 AND ALL RELATED MATTERS.
 22

23 **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEPOSITION DEADLINE**
 24 **OF CENTRAL WASHINGTON ASPHALT, INC.'S PERSON MOST QUALIFIED**

25 Pursuant to LR 6-1 and LR 26-4, Plaintiffs WILLIAM TERRELL, Guardian Ad Litem for
 26 QUENTIN SLAGOWSKI, a minor, ANIKA SLAGOWSKI, a minor, and ROWAN
 27 SLAGOWSKI (“Plaintiffs”) and Defendants Central Washington Asphalt, Inc. (“CWA”), Donald
 28 Frank Hannon, James Wentland and Jerry Goldsmith (collectively, the “CWA Defendants”)

1 by and through their respective attorneys of record, stipulate and agree as follows:

2 On February 25, 2015, this Honorable Court entered an Order (#400) regarding certain
3 discovery and the respective deadlines related thereto. Specifically, the deadline to complete
4 discovery regarding Plaintiffs' Cause of Action for Aiding and Abetting is June 5, 2015.

5 However, due to various scheduling issues and Plaintiffs' counsel's recent shoulder surgery, the
6 parties were unable to schedule the deposition of CWA's FRCP 30(b)(6) witnesses regarding
7 Plaintiffs' Cause of Action for Aiding and Abetting to take place prior to June 5, 2015.

8 Currently, the deposition of CWA's FRCP 30(b)(6) witnesses regarding the foregoing cause of
9 action is scheduled to take place on June 26, 2015 in Seattle, Washington.

10 Therefore, counsel for Plaintiffs and the CWA Defendants **STIPULATE AND AGREE**
11 **AS FOLLOWS:**

12 (1) The deadline for completion of CWA's FRCP 30(b)(6) witness' deposition
13 regarding Plaintiffs' cause of action for aiding-and-abetting shall be extended to June 30, 2015.

14 (2) But for the deposition of CWA's FRCP 30(b)(6) witness as set forth above, the
15 June 5, 2015 aiding-and-abetting discovery cutoff date stands.

16 Dated this 20th day of May, 2015

Dated this 20th day of May, 2015

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8
9 **[Proposed] ORDER**

10 **IT IS SO ORDERED.**



11
12 ~~UNITED STATES DISTRICT COURT~~
MAGISTRATE

13 Dated: May 21, 2015

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