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

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KARL E. RISINGER, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

SOC LLC, a Delaware limited liability
company registered and doing business in
Nevada as SOC NEVADA LLC; SOC-SMG,
INC., a Nevada corporation; DAY &
ZIMMERMANN, INC., a Maryland
corporation; and DOES 1-20, inclusive,

Defendants.

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION TO EXTEND
DEADLINE FOR PHASE II
DISCOVERY**
(Second Request)

1 WHEREAS, on December 29, 2017, at the status hearing before the Court, the Court
2 ordered a schedule for post-certification discovery, class notice, and pretrial deadlines (ECF No.
3 191);

4 WHEREAS, the parties have diligently sought to schedule all noticed depositions in a
5 timely manner, but witness and counsel's availability has required certain rescheduling;

6 WHEREAS, the parties wish to extend the deadline to allow for the completion of the
7 noticed depositions, particularly Plaintiff's 30(b)(6) deposition of SOC, LLC, and the deposition
8 of the sole class representative, Karl Risinger, before serving expert witness disclosures; and

9 WHEREAS, this request for an extension on the discovery deadline will not prejudice the
10 overall schedule as the Court has not yet set a trial date;

11 NOW THEREFORE, the parties hereby stipulate and agree to the following:

12 DISCOVERY SCHEDULE

13 1. Any expert witness disclosures on the issue of damages must be made no later
14 than April 23, 2018.

15 2. Any rebuttal expert witness disclosures on the issue of damages must be made no
16 later than May 23, 2018.

17 3. All expert witness depositions on the issue of damages must be completed no later
18 than June 1, 2018.

19 TRIAL DEADLINES

20 4. Plaintiff shall submit its trial plan on or before June 15, 2018.

21 5. Plaintiff and Defendants will file a joint pretrial order on June 29, 2018.

22
23 Dated: April 4, 2018

EARLY SULLIVAN WRIGHT GIZER & McRAE
LLP

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25 By: /s/ Scott E. Gizer
SCOTT E. GIZER
DEVIN A. MCRAE
Attorneys for Plaintiff
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Dated: April 4, 2018

QUINN EMANUEL URQUHART & SULLIVAN
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By: /s/ Tara Lee
TARA LEE
KEITH H. FORST
DANIEL P. MACH
Attorneys for Defendants

In association with:
E. LEIF REID
KRISTEN L. MARTINI
Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated this 6th day of April, 2018


UNITED STATES MAGISTRATE JUDGE