MICHAEL R.HALL 1 Nevada Bar No. 005978 mhall@lawhic.com 2 RILEY A. CLAYTON Nevada Bar No. 005260 relayton@lawhie.com 4 JACOB S. SMITH Nevada Bar. No. 010231 jsmith@lawhjc.com 5 6 HALL JAFFE & CLAYTON, LLP 7455 West Washington Avenue 7 SUITE 460 LAS VEGAS, NEVADA 89128 8 (702) 316-4111 FAX (702)316-4114 9 Attorney for Plaintiff 10 UNITED STATES DISTRICT COURT 11 12 DISTRICT OF NEVADA 13 ZAN KORBA, individually, a Nevada CASE NO. 2:12-cv-01391-GMN-PAL Resident, 14 REQUEST FOR EXPEDITED BRIEFING Plaintiff, 15 **SCHEDULE** VS. 16 THE HARTFORD UNDERWRITERS INSURANCE COMPANY, a foreign 17 insurance company; DOES I through 100, inclusive; and ROE CORPORATIONS I 18 through 100; inclusive, Defendants. 19 20 Plaintiff, Zan Korba, respectfully submits the instant request for an expedited briefing schedule 21 and hearing date for his Countermotion for Protective Order, which is submitted jointly with his 22 Opposition to Hartford's Motion for Protective Order, ECF No. 51. 23 INTRODUCTION I. 24 The parties have a pending discovery dispute regarding the appropriate scope of a Rule 30(b)(6) 25 deposition of Defendant Hartford. The parties have already agreed to an expedited briefing schedule on 26 that matter, which was approved and ordered by this Court, ECF 49. The hearing for that motion has 27

been set for September 19, 2013. ECF No. 49.

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II. PROPOSED SCHEDULE

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Hartford has noticed the Continued Deposition of Plaintiff Zan Korba for September 24, 2013. As set forth in Plaintiff's Opposition and Countermotion, Plaintiff is seeking protection and/or limitation on that deposition. As the hearing on Hartford's Motion for Protective Order is set for September 19, 2013, Plaintiff proposes using that same hearing date to decide its Motion for Protective Order.

Accordingly, Plaintiff proposes using the following briefing schedule:

- Plaintiff will file its Countermotion on Friday, September 6, 2013 1.
- 2. Hartford's Opposition will be due on September 13, 2013
- Plaintiff's Reply will be due on September 17, 2013 3.
- The hearing of Plaintiff's Countermotion for Protective Order will take place on 4. September 19, 2013 at 9:00, jointly with the hearing on Hartford's Motion for Protective Order.

In the event that the Court is unable to hear this matter based on the briefing schedule above, Plaintiff requests that the Court revise the Briefing schedule as necessary to accommodate a hearing prior to the September 24, 2013 deposition.

DATED this 6th day of September, 2013.

HALL JAFFE & CLAYTON, LLP

By /s/ Michael R. Hall MICHAEL R. HALL Nevada Bar No. 005978 JACOB S. SMITH Nevada Bar. No. 010231 7455 West Washington Avenue, Suite 460 Las Vegas, Nevada 89128 Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:

DATED: September 10, 2013

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CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify under penalty of perjury that I am an employee of HALL JAFFE & CLAYTON, LLP, and that on the 6th day of September, 2013, the foregoing REQUEST FOR EXPEDITED BRIEFING SCHEDULE was served upon the parties via the Court's e-filing and service program addressed as follows:

> Joseph T. Nold, Esq. ACCELERATED LAW GROUP 624 South 10th Street Las Vegas, Nevada 89101 Fax: (702) 383-6051 Email: ual@cox.net Co-Counsel for Plaintiff

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/s/ Lisa C. Johnson An Employee of

HALL JAFFE & CLAYTON, LLP

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