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12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

15 MARTIN MARTINEZ,)	CASE NO. 2:13-cv-00003-APG-VCF
)	
)	16 STIPULATION AND ORDER TO AMEND
)	17 DISCOVERY PLAN AND SCHEDULING
Plaintiff,)	ORDER
)	
vs.)	18 [FIRST REQUEST]
)	
)	
20 CLARK COUNTY, a political subdivision, and)	
21 municipality including its department,)	
UNIVERSITY MEDICAL CENTER,)	
)	
Defendants.)	
)	
)	
)	
)	

25 _____
 26 Plaintiff, MARTIN MARTINEZ (hereinafter "Plaintiff" or "Martinez") and Defendant,
 27 CLARK COUNTY, a political subdivision, and municipality including its department,
 28 UNIVERSITY MEDICAL CENTER (hereinafter "Defendant" or "UMC"), by and through their

1 undersigned counsel, hereby agree and stipulate to amend the current Discovery Plan and
2 Scheduling Order (Dkt #11), by extending the current discovery cut-off date of September 2, 2013
3 and related dates 90 days.

4
5 **1. Statement specifying the discovery completed to date.**

6 Plaintiff:

7 Initial disclosures	May 3, 2013
8 Plaintiff's First Set of Requests for Production	May 25, 2013
9 Plaintiff's First Set of Interrogatories	May 25, 2013
10 Responses to Defendant's Interrogatories	Currently due September 2, 2013
11 Responses to Defendant's Requests for Production	Currently due September 2, 2013

12
13 Defendant:

14 Initial Disclosures	May 6, 2013
15 First Supplement Initial Disclosures	June 5, 2013
16 Responses to Plaintiff's First Set of Interrogatories	July 22, 2013
17 Responses to Plaintiff's First Set of Requests for 18 Production	July 23, 2013
19 Defendant's Interrogatories (Set One) to Plaintiff	August 2, 2013
20 Defendant's Requests for Production of Documents 21 and other Tangible Things (Set One) to Plaintiff	August 2, 2013

22
23 **2. A specific description of the discovery that remains to be completed.**

24 Plaintiff currently desires to depose Karen Edwards, James Mumford, Anthony Tyler,
25 Teresa Scupi, Cheryl Zimmer, Vicki Wolms, Firooz Mashhood, M.D. and G. Michael Elkanich,
26 M.D. Defendant currently desires to depose Plaintiff. Both parties are in the process of
27 scheduling these depositions.
28

1 In addition both parties might propound additional written discovery.

2 **3. The reasons why the discovery remaining was not completed within the time limits set**
3 **by the scheduling order.**

4 1. Counsel for Plaintiff has recently prepared two oppositions to motions for summary
5 judgment, in addition to his workload in other cases; and

6 2. Defendant's counsel is currently involved in a complex matter involving three
7 separate cases consolidated for discovery purposes. In addition, Defendant's counsel has been
8 involved in three labor arbitration matters which have consumed more time than anticipated.

9 **4. A proposed schedule for completing all remaining discovery.**

10 1. Last day to conduct discovery: December 2, 2013.

11 2. Last day to file dispositive motions: January 2, ~~2013~~²⁰¹⁴.

12 3. Last day to file Joint Pretrial Order: February 1, ~~2013~~²⁰¹⁴. In the event dispositive
13 motion(s) are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days
14 after the Court enters a ruling on the dispositive motions, or otherwise by further order of the
15 Court.

16 This is the parties' first request for an extension of the discovery deadline and is being
17 done ~~20~~²¹ days before the current discovery cut-off.

18 For good cause shown, the parties request that this stipulation and order be granted.

19 Respectfully submitted,

20 DATED: 08/13/2013

LAW OFFICES OF MICHAEL P. BALABAN

21 BY: /s/ Michael P. Balaban
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