Doc. 265 Calvert v. Ellis et al

EGLET STRINGE

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8	-and-		
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	Las Vegas, Nevada 89107		
13	Tel: (702) 333-1111 Attorneys for Plaintiff		
14	Allorneys for 1 laintiff		
15			
16	UNITED STATES DISTRICT COURT		
17	DISTRICT OF NEVADA		
18		LOLGENO 212	
19	LAUREN CALVERT, individually,	CASE NO.: 2:13-cv	
20		STIPULATION	
21	Plaintiff, vs.	EXTENSION C JOINT REPORT	
		FROM MEET	
22	DARLENE ELLIS AS SUCCESSOR IN INTEREST TO MICHAEL WAYNE ELLIS;	REGARDING EXHIBITS AND O	
23	EXPRESS DAILY; DAILY EXPRESS, INC.;	MATTERS PU	
24	DOE OWNER, I-V, DOE DRIVER, I-V, ROE	COURT'S JA	
25	EMPLOYER, AND ROE COMPANIES, inclusive,	MINUTE OR (FIRST)	

Defendants.

CASE NO.: 2:13-cv-00464-APG-NJK

STIPULATION AND ORDER FOR **EXTENSION OF TIME TO FILE** JOINT REPORT WITH RESULTS FROM MEET AND CONFER **REGARDING WITNESSES, EXHIBITS AND OTHER PRE-TRIAL** MATTERS PURSUANT TO THE **COURT'S JANUARY 20, 2016 MINUTE ORDER [DKT. 257]** (FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between Plaintiff, LAUREN CALVERT, by and through her attorneys, DENNIS M. PRINCE, ESQ., and ERICA D. ENTSMINGER, ESQ., of the law firm of EGLET PRINCE, and Defendants, EXPRESS DAILY and DAILY EXPRESS, INC., by and through their attorneys of record, DOUGLAS B. MARCELLO, ESQ. of MARCELLO & KIVISTO, LLC, and SCOTT A. FLINDERS, ESQ. of HUTCHISON & STEFFEN, LLC, pending the Court's approval, that the date for the parties to file a joint report regarding witnesses, exhibits and deposition designations and other pre-trial matters be extended.

On January 20, 2016, the Court entered a minute order requiring the parties to meet and confer with regard to witnesses, trial exhibits, exhibit lists, deposition designations and other pretrial matters, and to file a joint report on the results of that conference by March 21, 2016. [Dkt. 257]. On March 2, 2016, EGLET PRINCE filed a Motion For Leave To Withdraw as Counsel of Record [Dkt. 262], with MORRIS ANDERSON remaining as counsel for Plaintiff. As of the date of this stipulation, the Court has yet to rule on the subject motion.

The parties request this extension based on the pending motion, and to provide Plaintiff's remaining counsel with adequate opportunity to prepare for and participate in the subject conference. The parties therefore respectfually request that the Court extend the time to conduct the subject meet and confer from March 21, 2016 to a date fourteen (14) days following the date the Court rules upon EGLET PRINCE'S pending motion to withdraw.

ORDER

IT IS SO ORDERED.

Dated: March 30, 2016.

UNITED STATES DISTRICT JUDGE

1	DATED this 16th day of March, 2016.	DATED this 16th day of March, 2016.	
2	EGLET PRINCE	MARCELLO & KIVISTO	
3	/s/ Erica D. Entsminger	/s/ Douglas Marcello	
4	ERICA D. ENTSMINGER, ESQ. Nevada Bar No.: 7432	DOUGLAS B. MARCELLO, ESQ. Pro Hac Vice	
5	400 South Seventh Street, Suite 400	1200 Walnut Bottom Road, Suite 331 Carlisle, Pennsylvania 17015	
6	Las Vegas, Nevada 89101 Attorneys for Plaintiff	Attorneys for Defendants	
7			
8	DATED this 16th day of March, 2016.		
9	HUTCHISON & STEFFEN, LLC		
10	/s/ Scott A. Flinders		
11	SCOTT A. FLINDERS, ESQ.		
12	Nevada Bar No.: 9154 10080 West Alta Drive, Suite 200		
13	Las Vegas, Nevada 89145 Attorneys for Defendants		
14	Attorneys for Defendants		
15	ORDER		
16	IT IS SO ORDERED this	day of March 2016	
17	11 13 30 ORDERISO UIIS	day of March, 2010.	
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19	IINITE	D STATES MACHSTRATE JUDGE	
20		D STATES MAGISTRATE JODGE	
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