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

11 \*\*\*

12 TEAH JAYNES, individually,  
 13 Plaintiff,  
 14 v.  
 15 G4S SECURITY SOLUTIONS USA, INC.;;  
 JANE DOE 1; DOES 2 through 5; ROE  
 16 CORPORATIONS 1 through 5  
 Defendants.

CASE NO.: 2:13-cv-00788-KJD-CWH

**DEFENDANT G4S'S REQUEST TO  
 EXTEND DUE DATE TO FILE JOINT  
 DISCOVERY PLAN  
 (FIRST REQUEST)**

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17 Defendant G4S hereby requests to Court grant a one-week extension to allow the parties  
 18 to file a Joint Stipulated Discovery Plan. Due to the parties' schedules, they have not yet been  
 19 able to schedule the Federal Rules of Civil Procedure, Rule 26 Conference and therefore, have  
 20 been unable to complete the discovery plan due on June 20, 2013.

21 As stated in Defendant's Individual Status Report (# 10), the parties are discussing  
 22 Defendant voluntarily remanding the case if Plaintiff concedes that her claim does not have a  
 23 probable value exceeding \$50,000. As a condition to the remand, Plaintiff must agree that her  
 24 recovery, if any, against the Defendants, either individually or jointly, be limited to no more than  
 25 \$50,000, exclusive of any award of prejudgment or post-judgment interest, costs, and fees and by  
 26 agreeing to such limitation of damages, Plaintiff recognizes that her action shall no longer meet  
 27 the necessary "amount in controversy" requirement of 28 USC §1332, and it will be referred to  
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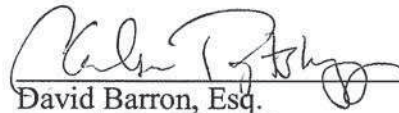
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1 the State District Court's Mandatory Court-Annexed Arbitration Program as a claim not  
2 exceeding \$50,000 in value. As a condition to the stipulation, Defendant has requested Plaintiff  
3 agree that the case will remain in the Mandatory Arbitration Program and Plaintiff may not later  
4 request exemption from the program.

5 Currently Plaintiff's counsel is out of the office until Monday June 24, 2013, but G4S  
6 anticipates shortly thereafter that the parties will be able to resolve whether this case will be  
7 voluntarily remanded to State Court—making the discovery plan moot—or if they will proceed in  
8 Federal Court and immediately file a Stipulated Discovery Plan. Based on the foregoing,  
9 Defendant G4S requests a one-week extension, June 27, 2013, for the parties to file a Stipulated  
10 Discovery Plan.

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12 Respectfully Submitted,

13 BARRON & PRUITT, LLP.

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23 *G4S SECURITY SOLUTIONS USA, INC.*

24 "IT IS SO ORDERED"

25   
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: 24 day of June 2013.  
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