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*Defendant in Pro Se*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARK ANDERSON, )  
)  
Plaintiff, )  
)  
v. )  
)  
WESLEY S. WHITE, )  
THE LAW OFFICES OF WESLEY S. )  
WHITE, a Sole Proprietorship; )  
DOES AND ROES I-X, Inclusive, jointly )  
and severally. )  
Defendants. )

Case No. 2:13-cv-02097-JCM-VCF

**STIPULATION AND ORDER to  
EXTEND DISCOVERY  
DEADLINES (Fourth Request)**

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COMES NOW THE DEFENDANTS by and through their attorney, Wesley S. White, Esq., of the Law Offices of Wesley S. White and the PLAINTIFF, through his counsel of record, Monty K. VanderMay, Esq. of The VanderMay Law Firm, P.C. and Keith M. Lyons Jr., Esq., of Lyons Law Firm and submit the Fourth Request to Extend Discovery Deadline (Depositions Only).

1. That in January of 2015 the Court filed the Third Request to Extend Discovery Plan and Scheduling Order.
2. That pursuant to that Order, the Discovery cut-off is currently set for June 9, 2015.
3. That the Parties have largely completed written discovery and the deposition of the Defendant(s) has been taken.

4. That the Plaintiff's expert witness and report has been disclosed and that the Defendants' rebuttal expert witness and report has been disclosed, and the Interim Status Report has been filed.
5. That due to the Defendant travelling from North Carolina to Nevada and due to the schedules of the Plaintiff, his attorneys, and both designated experts, all Parties have agreed that the Discovery cut-off date should be extended sixty days (60) in order to allow time for depositions.
6. That Defendant shall take the deposition of the Plaintiff's expert, Robert Dickerson, Esq., on June 10, 2015 at 10:30 am in Las Vegas, NV.
7. The Parties have further agreed that the Defendant shall take the Deposition of the Plaintiff, Mark Anderson, on June 10, 2015 at 2:00 pm in Las Vegas, NV.
8. That this extension shall not affect the proposed trial dates.
9. Based on the foregoing, counsels for the parties have agreed to extend discovery. Therefore, the parties request that this Court extend discovery deadlines as follows:
  - a. Discovery Cut-Off Date. All discovery must be commenced in time to be completed by August 10, 2015.
  - b. Dispositive Motions. The parties shall have until September 9, 2015, to file dispositive motions. This is thirty (30) days after the discovery cut-off date and does not exceed the outside limit of thirty (30) days following the discovery cut-off date that LR-26-1(e)(4) presumptively set for filing dispositive motions.
  - c. Pretrial Order: The Pretrial order shall be filed by October 9, 2015, which is not more than thirty days (30) days after the date set for filing dispositive motions in this case, that LR 26-1(e)(5) presumptively sets for filing the Pretrial Order. This

deadline is suspended if a dispositive motion is timely filed. The disclosures Fed. R. Civ. P. 26(a)(3) requires shall be made in the joint pretrial order.

- d. Extensions or modifications of the Discovery Plan and Scheduling Order. LR 26 governs modifications or extensions of this discovery plan and scheduling order. Any stipulation or motion must be made not later than July 20, 2015, twenty-one (21) days before the discovery cut-off date and comply fully with LR 26-4.

APPROVED AS TO FORM AND CONTENT this 19<sup>th</sup> day of May 2015

/s/ Wesley S. White  
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-and-

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**ORDER**

**IT IS SO ORDERED.**

By:

  
UNITED STATES MAGISTRATE JUDGE

Dated: 5-20-2015

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of May, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

Monty K. Vandermy, Esq.  
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*Attorneys for Plaintiff*

Respectfully submitted this the 19<sup>th</sup> day of May 2015.

/s/ Wesley S. White \_\_\_\_\_  
Wesley S. White