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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 VALERIE HIRATA; WHITNIE TAYLOR; and  
9 ANGELA JONES

CASE NO.: 2:13-cv-02302-LDG-VCF

10 Plaintiffs,

11 v.

**STIPULATION AND ORDER TO**  
**EXTEND TIME TO COMPLETE**  
**DISCOVERY PURSUANT TO LR 26-4**  
**(FIFTH REQUEST)**

12 SOUTHERN NEVADA HEALTH DISTRICT, a  
13 political subdivision of Clark County, Nevada;  
14 GLENN SAVAGE, in both his individual and  
15 official capacity; AMY IRANI, in both her  
16 individual and official capacity; SUSAN LABAY,  
17 in both her individual and official capacity;  
18 JACQUELYN RAICHE-CURL, in both her  
19 individual and official capacity; ANGUS  
20 MACEACHERN, in both his individual and  
21 official capacity; ROBERT GUNNOE, in both his  
22 individual and official capacity; KIM  
23 DIPASQUALE, in both her individual and official  
24 capacity; LAWRENCE SANDS, in both his  
25 individual and official capacity;

26 Defendants.

27 Pursuant to LR 26-4, the parties, by and through their respective counsel of record, for good  
28 cause, and hereby stipulate to extend the discovery deadlines in the above-entitled matter by one  
hundred fifty (150) days up to including March 3, 2016. The parties state the following:

1. **Statement specifying discovery completed:**

<u>DOCUMENT</u>	<u>DATE</u>	<u>PARTY</u>
Notice of LR 26-1 Conference	02/26/14	PSL
Plaintiffs' Initial Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	02/28/14	PSL
Plaintiffs' First Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/07/14	PSL
Plaintiffs' Second Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/14/14	PSL
Defendants' Fed. R. Civ. P. 26(f) Production	03/14/14	Olson/Cannon
Plaintiffs' Third Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/21/14	PSL
Plaintiffs' Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/25/14	PSL
Plaintiffs' Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/28/14	PSL
Plaintiffs' Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendant Southern Nevada Health District	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendants angus MacEachern, Lawrence Sands, Kim DiPasquale and Robert Gunnoe	04/08/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista	04/08/14	PSL
Defendants Southern Nevada Health District, Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Initial Disclosures	04/10/14	Fisher/Phillips

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Plaintiffs' Seventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/11/14	PSL
Plaintiffs' Eighth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/18/14	PSL
Plaintiffs' Ninth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/18/14	PSL
Certificate of Service	05/01/14	PSL
Plaintiffs' Tenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/05/14	PSL
Defendants' Responses to First Set of Request for Production of Documents to defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorrain Forston, Robert Newton, an Cara Evangelista	05/12/14	Olson/Cannon
Plaintiffs' Notice of Issuance of Subpoena for Production of Documents	05/15/14	PSL
Plaintiff's Eleventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/16/14	PSL
Affidavit of Service	05/22/14	PSL
Defendant Southern Nevada Health District's Responses to Plaintiffs' First Set of Request for Production of Documents	05/27/14	Fisher/Phillips
Defendants Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Responses to Plaintiffs' First Set of Request for Production of Documents	05/27/14	Fisher/Phillips
Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips

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Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Plaintiffs' Twelfth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/09/14	PSL
Plaintiffs' Notice of Taking Videotaped Depositions (All Defendants)	06/18/14	PSL
Defendants' Responses to First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista (First Supplement)	06/23/14	Olson/Cannon

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Plaintiffs' Responses to Southern Nevada Health District's Request for Production of Documents	07/07/14	PSL
Plaintiffs' Thirteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/14	PSL
Plaintiffs' Fourteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/30/14	PSL
Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
Plaintiff Valerie Hirata's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
Plaintiff Valerie Hirata's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
Plaintiff Valerie Hirata's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
Plaintiff Valerie Hirata's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
Plaintiff Angela Jones' Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
Plaintiff Angela Jones' Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
Plaintiff Angela Jones' Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
Plaintiff Angela Jones' Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL

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Plaintiff Whitnie Taylor's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
Defendant Southern Nevada Health District's Second Set of Interrogatories to Plaintiffs	08/06/14	Fisher/Phillips
Defendant Southern Nevada Health District's Second Requests for Production of Documents to Plaintiffs	08/06/14	Fisher/Phillips
Plaintiffs' Fifteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/03/14	PSL
Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Second Supplement)	09/09/14	Olson/Cannon
Plaintiffs' Sixteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/09/14	PSL
Deposition of Lorraine Forston, Vol 1	09/10/14	PSL
Plaintiffs' Answers to Southern Nevada Health District's Second Set of Interrogatories	09/15/14	PSL
Plaintiffs' Responses to Southern Nevada Health District's Second Request for Production of Documents	09/15/14	PSL
Plaintiffs' Seventeenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/15/14	PSL
Plaintiffs' First Supplemental Responses to Southern Nevada Health District's First Request for Production of Documents	09/15/14	PSL
Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Third Supplement)	09/18/14	Olson/Cannon
Deposition of Robert Gunnoe	09/19/14	PSL

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First Supplement to Defendants Southern Nevada Health Districts, Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Initial Disclosures	09/23/14	Fisher/Phillips
Plaintiffs' Third Set of Request for Production of Documents to Defendant Southern Nevada Health District	10/07/14	PSL
Plaintiffs' Eighteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	10/17/14	PSL
Deposition of Lawrence Sands	10/20/14	PSL
Deposition of Robert Newton	10/22/14	PSL
Deposition of Lorraine Forston, Vol II	10/23/14	PSL
Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Fourth Supplement)	11/10/14	Olson/Cannon
Plaintiffs' Nineteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	11/12/14	PSL
Deposition of Rose Henderson	11/13/14	PSL
Deposition of Susan Leaverton	11/19/14	PSL
Deposition of Amy Irani	11/20/14	PSL
Plaintiffs' First Set of Interrogatories to Defendant Southern Nevada Health District	12/12/14	PSL
Defendant Southern Nevada Health District's Third Request for Production of Documents to Plaintiffs	12/24/14	Fisher/Phillips
Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Valerie Hirata	12/24/14	Fisher/Phillips
Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Angela Jones	12/24/14	Fisher/Phillips
Defendant Southern Nevada Health District's Third Set of Interrogatories to Plaintiff Whitney Taylor	12/24/14	Fisher/Phillips

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Plaintiffs' Twentieth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/06/15	PSL
Deposition of Jacque Raiche-Curl	01/07/15	PSL
Plaintiffs' Twenty-first Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/26/15	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
Defendant Southern Nevada Health District's Answers to Plaintiffs' First Set of Interrogatories	01/22/15	Fisher/Phillips
Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/25/15	PSL
Plaintiffs' Responses to Defendant Southern Nevada Health District's Third Request for Production of Documents to Plaintiffs	01/26/15	PSL
Glenn Savage's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
Glenn Savage's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
Defendants' Request for Production of Documents to Valerie Hirata	03/03/15	Olson/Cannon
Amy Irani's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
Amy Irani's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
Susan LaBay's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
Susan LaBay's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon



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Jacquelyn Raiche-Curl's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
Glenn Savage's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
Glenn Savage's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
Defendants' Request for Production of Documents to Whitnie Taylor	03/03/15	Olson/Cannon
Amy Irani's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
Amy Irani's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
Susan LaBay's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
Susan LaBay's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
Glenn Savage's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Glenn Savage's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Defendants' Request for Production of Documents to Angela Jones	03/03/15	Olson/Cannon
Amy Irani's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Amy Irani's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Susan LaBay's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Susan LaBay's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Interrogatories to Angela Jones	03/03/15	Olson/Cannon

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Plaintiffs' Twenty-second Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/11/15	PSL
Deposition of Steven Goode, Vol 1	03/12/15	Fisher/Phillips
Deposition of Steven Goode, Vol 2	03/15/15	PSL
Plaintiffs' Notice of Vacating the Deposition of Tim Pangborn	03/17/15	PSL
Notice of Deposition – All Plaintiffs	04/03/15	Fisher/Phillips
Plaintiffs' Eleventh Amended Notice of Videotaped Deposition – Steven Goode	04/07/15	PSL
Notice of Deposition of Steve Goode	04/07/15	Fisher/Phillips
Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Whitnie Taylor	04/09/15	Fisher/Phillips
Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Valerie Hirata	04/09/15	Fisher/Phillips
Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Angela Jones	04/09/15	Fisher/Phillips
Defendant Southern Nevada Health District's Fourth Request for Production of Documents to Plaintiffs' (NOS. 23-26)	04/09/15	Fisher/Phillips
Deposition of Steven Goode, Vol 3	04/20/15	PSL
Plaintiffs' Twenty-Third Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/20/15	PSL
Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – MGM Grand Hotel LLC	04/22/15	PSL
Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – Crescent Hotels & Resorts	04/22/15	PSL

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Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action– HRHH Hotel/Casino	4/22/15	PSL
Plaintiffs’ Notice of Taking Depositions (Custodian of Records)	04/22/15	PSL
Notice of Deposition of Valerie Hirata	04/23/15	Fisher/Phillips
Notice of Deposition of Angela Jones	04/23/15	Fisher/Phillips
Notice of Deposition of Whitnie Taylor	04/23/15	Fisher/Phillips
Affidavit of Service – to HRHH Hotel/Casino	04/24/15	PSL
Affidavit of Service – to MGM Grand Hotel	04/24/15	PSL
Plaintiffs’ Twenty-Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/26/15	PSL
Proof of Service – Crescent Hotels & Resorts, LLC	04/30/15	PSL
Notice of Vacating Depositions	05/04/15	Fisher/Phillips
Amended Notice of Deposition of Whitnie Taylor	05/05/15	Fisher/Phillips
Amended Notice of Deposition of Angela Jones	05/05/15	Fisher/Phillips
Amended Notice of Deposition of Valerie Hirata	05/05/15	Fisher/Phillips
Plaintiffs’ Twelfth Amended Notice of Videotaped Depositions	05/13/15	PSL
Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action	05/15/15	PSL
Plaintiff’s Notice of Taking the Deposition of the Custodian of Records of Clark County Fire Dept.	05/15/15	PSL
Affidavit of Service - COR for Clark County Fire Dept.	5/19/15	PSL
Plaintiffs’ Notice of Taking the Deposition of the Custodian of Records of Clark County Fire Department	05/20/15	PSL

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Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a civil Action	05/20/15	PSL
Plaintiffs' Thirteenth Amended Notice of Videotaped Depositions	05/20/15	PSL
Valerie Hirata's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Glenn Savage's Request For Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL

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Plaintiffs Valerie Hirata's Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
Plaintiff Angela Jones' Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
Plaintiff Angela Jones' Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
Plaintiff Angela Jones' Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
Plaintiff Angela Jones' Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
Plaintiffs Whitnie Taylor's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
Plaintiffs Whitnie Taylor's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Amy Irani's First Set of Interrogatories	05/20/15	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
Whitnie Taylor's Responses to Defendant's Request for Production of Documents	05/20/15	PSL
Valerie Hirata's Responses to Defendants' Request for Production of Documents	05/20/15	PSL
Angela Jones' Responses to Defendants' Request for Production of Documents	05/20/15	PSL
Plaintiffs Twenty-Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/20/15	PSL
Defendant Southern Nevada Health District's Supplemental Responses to Plaintiffs' Third Set of Request for Production of Documents	05/22/15	Fisher/Phillips

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Defendant Southern Nevada Health District's Supplemental Responses to Plaintiff's First Set of Request for Production of Documents	05/22/15	Fisher/Phillips
Affidavit of Service – COR for Clark County Fire Department	05/27/15	PSL
Plaintiffs Twenty-Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/01/15	PSL
Deposition of Defendant Angus MacEachern	06/08/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff Angela Jones's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff's Responses to Defendant Southern Nevada Health District's Fourth Set of Request for Production of Documents (NOS. 23-26)	06/08/15	PSL
Plaintiffs' Notice of Objection to (1) Amended Notice of Deposition of Valerie Hirata; (2) Amended Notice of Deposition of Angela Jones and (3) Amended Notice of Deposition of Whitnie Taylor	06/08/15	PSL
Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action-Depo International, LLC	06/11/15	PSL
Plaintiff Notice of Taking the Deposition of the Custodian of Records of Depo International, LLC	06/12/15	PSL
Deposition of Plaintiff Angela Jones, Vol 1	06/15/15	Fisher/Phillips
Deposition of Plaintiff Angela Jones, Vol 2	06/16/15	Fisher/Phillips
Deposition of Plaintiff Valerie Hirata, Vol 1	06/17/15	Fisher/Phillips

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Deposition of Plaintiff Valerie Hirata, Vol 2	06/18/15	Fisher/Phillips
Deposition of Plaintiff Whitnie Taylor	06/19/15	Fisher/Phillips
Affidavit of Service – Depo International, LLC	6/30/15	PSL
Defendants’ Fed. R. Civ. P. 26(f) Production Sixth Supplement	07/14/15	Olson/Cannon
Plaintiffs’ Notice of Vacating the Videotaped Deposition of Cara Evangelista	07/16/15	PSL
Plaintiffs’ Twenty-Seventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/15	PSL
Deposition of Glenn Savage, Vol. 1	07/23/15	PSL

**2. Specific description of discovery that needs to be completed:**

Plaintiffs and Defendants will retain and disclose expert witnesses, rebuttal expert disclosures, possible continued depositions of all Plaintiffs in addition to the depositions of Defendants Glenn Savage (Vol. 2) and Kim DiPasquale. Additional depositions of the person(s) most knowledgeable for Defendants, depositions of any percipient witnesses and lay witnesses; and additional Interrogatories, Requests for Admission and Requests for Production to Plaintiffs and Defendants (if necessary).

**3. The reasons why the deadline was not satisfied:**

The plaintiffs’ worked for the Southern Nevada Health District for approximately ten (10) years each. As such, the instant lawsuit alleges causes of actions pertaining to the history of the plaintiffs’ employment that requires extensive investigation by all parties.

Due to the large number of depositions that must occur in this case and handling scheduling conflicts among the parties and their counsel, not all depositions will be able to be scheduled within sufficient time before the current close of discovery deadline. In addition to the remaining

1 defendants to be deposed (Glenn Savage, Vol. 2 and Kim DiPasquale), the plaintiffs anticipate taking  
 2 the depositions of approximately ten (10) additional third-party witnesses.

3 It will be beneficial to have completed the remaining depositions prior to the initial expert  
 4 disclosure in order for the experts to have all necessary information prior to the time of the initial  
 5 disclosure deadline.

6 Finally, as of Plaintiffs' 28<sup>th</sup> supplement to their initial disclosures, they have identified  
 7 several hundred witnesses and have produced approximately 25,000 pages of documents.  
 8 Completing depositions of the parties will be important to further narrow down those witnesses and  
 9 documents.

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 11 **4. Proposed schedule for completing discovery:**

<u>Scheduled Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Deadline	October 5, 2015	Thursday, March 3, 2016
Amend Pleadings/Add Parties	August 3, 2015	Monday, December 5, 2016
Initial Expert Disclosure Deadline	August 3, 2015	Monday, December 5, 2016
Rebuttal Expert Deadline	September 4, 2015	Tuesday, February 2, 2016
Interim Status Report	August 3, 2015	Monday, December 5, 2016
Dispositive Motion Deadline	November 2, 2015	Monday, April 4, 2016
Pre-Trial Order (unless dispositive motions are filed, in which case the deadline shall be 30 days after decision of the dispositive motions or further order of the Court)	December 1, 2015	Wednesday, May 4, 2016
Last Day to Submit Motion and/or Stipulation to Extend Discovery	September 11, 2015	Friday, February 12, 2016

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1 DATED this 31<sup>st</sup> day of July, 2015.  
2 PARKER SCHEER LAGOMARSINO  
3  
4 /s/ Andre M. Lagomarsino, Esq.  
Andre M. Lagomarsino, Esq.  
5 9555 South Eastern Avenue, Suite 210  
Las Vegas, Nevada 89123  
6 *Attorney for Plaintiffs*

DATED this 31<sup>st</sup> day of July, 2015.  
OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI  
  
/s/ Peter Angulo, Esq.  
WALTER CANNON, ESQ.  
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9 DATED this 31<sup>st</sup> day of July, 2015.  
10 FISHER & PHILLIPS LLP  
11 /s/ Whitney Selert, Esq.  
12 MARK RICCIARDI, ESQ.  
WHITNEY SELERT, ESQ.  
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14 *Attorneys for Southern Nevada Health District,  
Maceachern, Sands, Gunnoe and Dipasquale*

**ORDER**

18 IT IS SO ORDERED.  
19 DATED this 31<sup>st</sup> day of July, 2015.

  
UNITED STATES MAGISTRATE JUDGE