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8 *Attorneys for Defendant/Cross-Defendant*
 9 *Anilox Roll Company, Inc. d/b/a*
 10 *ARC International, Inc.*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 CHARLIE RESOSO,
 Plaintiff,

14 v.

15 CLAUSING INDUSTRIAL, INC., ANILOX
 16 ROLL COMPANY WEST, INC. d/b/a ARC
 INTERNATIONAL; ANILOX ROLL
 17 COMPANY, INC. d/b/a ARC
 INTERNATIONAL, inclusive,

18 Defendants.

19 CLAUSING INDUSTRIAL, INC.

20 Cross-Claimant,

21 v.

22 ANILOX ROLL COMPANY, INC.

23 Cross-Defendant.
 24
 25

CASE NO.: 2:14-cv-00102-RFB-GWF

STIPULATION AND PROPOSED ORDER
TO AMEND DISCOVERY PLAN
(First Request)

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1 **STIPULATION AND PROPOSED ORDER TO AMEND DISCOVERY PLAN**

2 IT IS HEREBY STIPULATED by and between Plaintiff CHARLIE RESOSO
3 (“PLAINTIFF”), by and through his counsel of record, WILLIAM R. BRENSKE, ESQ. of the law
4 firm of BRENSKE & ANDREEVSKI; Defendant/Cross-Defendant ANILOX ROLL COMPANY,
5 INC. d/b/a ARC INTERNATIONAL (“ARC EAST”), by and through its counsel of record,
6 GRIFFITH H. HAYES, ESQ. and KEIVAN A. ROEBUCK, ESQ. of the law firm of LITCHFIELD
7 CAVO LLP; and Defendant CLAUSING INDUSTRIAL, INC. (“CLAUSING”), by and through its
8 counsel of record, GEORGE D. YARON, ESQ. and KEITH E. PATTERSON, ESQ. of the law firm
9 of YARON & ASSOCIATIES, to extend discovery deadlines for good cause shown. This Stipulation
10 and Proposed Order is submitted pursuant to and in compliance with LR IA 6-1 and LR 26-4, as
11 follows:

12 **1. Statement Specifying the Discovery Completed**

13 On September 28, 2017, ARC EAST filed its Motion for Summary Judgment (“MSJ”). On
14 September 29, 2017, ARC EAST’s Motion for Protective Order Regarding the FRCP 30(b)(6)
15 Deposition of ARC EAST was heard by United States Magistrate Judge George W. Foley. ARC
16 EAST’s Motion for Protective Order was granted, and as such, ARC EAST agreed to make its FRCP
17 30(b)(6) witnesses available at a time convenient for all parties. The Court also held in abeyance ARC
18 EAST’s disclosure of expert witnesses pending a further ruling by the Court on ARC EAST’s MSJ.
19 The Court further held that should the Court deny the MSJ, the parties will be given adequate time to
20 designate/disclose expert witnesses, rebuttal witnesses and complete disclosure, as discussed in open
21 court.

22 **2. A Specific Description of the Discovery that Remains to be Completed**

23 The FCRP 30(b)(6) depositions must be completed, ARC EAST’s MSJ must be fully briefed,
24 and the parties need to designate/disclose expert witnesses, rebuttal witnesses, and complete
25 disclosure.

26 **3. Reasons Why Discovery Is Not Completed**

27 Because of a family medical emergency concerning one of ARC EAST’s FRCP 30(b)(6)
28 deponents, ARC EAST needs to move the FRCP 30(b)(6) depositions to a later date.

1 **4. Proposed Schedule for Completing All Remaining Discovery**

2 The parties request a brief extension as follows:

	<u>Current Dates</u>	<u>Proposed New Dates</u>
4 FRCP 30(b)(6) depositions of ARC EAST	November 15, 2017 November 16, 2017	December 14, 2017 at 10:30 a.m. December 15, 2017 at 9:00 a.m.
6 Oppositions to ARC EAST's MSJ	December 18, 2017	January 19, 2018
7 ARC EAST's Reply in Support of MSJ	January 10, 2018	February 2, 2018
8 ARC EAST's Motion to Further Stay 9 Disclosure of Expert Witnesses	January 17, 2018	February 9, 2018

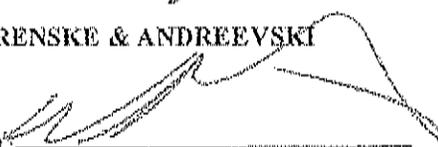
10 All other discovery cut-off dates stated in the parties' Discovery Plan and Scheduling Order
11 filed October 17, 2017 remain unchanged. These dates include:

13 Discovery Cut Off Date	January 29, 2018
14 Amending Pleadings and Adding Parties	CLOSED
15 Dispositive Motions	March 1, 2018
16 Pretrial Order	April 2, 2018

17 The undersigned respectively have the authority to execute this Stipulation and bind the
18 respective parties hereto.

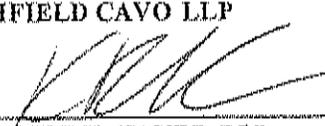
19
20 DATED this 13th day of November, 2017.

21 **BRENSKE & ANDREEVSKI**

22
23 By: 
24 WILLIAM R. BRENSKE, ESQ.
25 3800 Howard Hughes Pkwy, Suite 500
26 Las Vegas, Nevada 89169
27 *Attorneys for Plaintiff Charlie Resoso*

20 DATED this 14 day of November, 2017.

21 **LITCHFIELD CAVO LLP**

22
23 By: 
24 GRIFFITH H. HAYES, ESQ.
25 KEIVAN A. ROEBUCK, ESQ.
26 3993 Howard Hughes Pkwy, Suite 100
27 Las Vegas, Nevada 89169
28 *Attorneys for Defendant/Cross-Defendant Anilox
Roll Company, Inc. d/b/a ARC International, Inc.*

1 DATED this 14th day of November, 2017.

2 **YARON & ASSOCIATES**

3 By: /s/ Keith E. Patterson
4 GEORGE D. YARON, ESQ.
5 KEITH E. PATTERSON, ESQ.
6 1300 Clay Street, Suite 800
7 Oakland, CA 94612
8 *Attorneys for Defendant/Cross-Claimant*
9 *Clausing Industrial, Inc*

10 IT IS SO ORDERED.

11 DATED this 16 day of November, 2017

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13 _____
14 UNITED STATES MAGISTRATE JUDGE