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5 Attorney for the Plaintiff

6 **UNITED STATES DISTRICT COURT**  
 7 **FOR THE DISTRICT OF NEVADA**  
 8

9 **SHENDONNA SOPHIA McLAINE,**

10 **Plaintiff,**

Case No. 2:14-cv-0288-JAD-GWF

11 **v.**

12 **CLARK COUNTY, NEVADA; et. al.,**

13 **Defendants.**

14

15 **STIPULATION ABOUT DISCOVERY PROCEDURE**

16 Pursuant to Federal Rule of Civil Procedure 29 the parties respectfully request that the  
 17 Court approve this stipulation governing discovery procedure. At the outset it should be  
 18 emphasized that this is not a stipulation to extend discovery, which closes on October 31, 2016.  
 19 Rather, this is simply a stipulation to permit the parties to complete various depositions that were  
 20 timely noticed prior to the close of discovery but due to scheduling conflicts must now be  
 21 completed after the close of discovery. In submitting this stipulation for approval to the Court,  
 22 the parties intend to complete the depositions of the following individuals within approximately  
 23 the next two weeks:

- 24 1. "PMK" of Las Vegas Metropolitan Police Department;  
 25 2. "PMK" of the Clark County District Attorney's Office;  
 26 3. "PMK" of Clark County, Nevada;  
 4. Christopher Lalli, Esq.  
 5. Frank Coumou, Esq.



1 The parties respectfully request that the Court approve this stipulation which is not filed  
2 for the purpose of delay but rather merely to accommodate the busy schedules of various  
3 witnesses and for the purpose of completing depositions that were otherwise timely noticed.

4 Respectfully submitted,

5 */s/ Lucinda L. Coumou*

*/s/ Paul S. Padda*

6 Lucinda L. Coumou, Esq.  
7 Chief Deputy District Attorney, Civil Division  
8 Clark County District Attorney's Office

Paul S. Padda, Esq.  
Paul Padda Law

9 Attorney for Defendants Clark County, Nevada  
10 and the Clark County District Attorney's Office

Attorney for Plaintiff

Dated: October 27, 2016

Dated: October 27, 2016

11 */s/ Robert W. Freeman, Jr.*

12 Robert W. Freeman, Jr., Esq.  
13 Lewis Brisbois Bisgaard & Smith

14 Attorney for Las Vegas Metropolitan Police Department  
15 and Officers R. Zaccara and S. Friedman

Dated: October 27, 2016

16 **IT IS SO ORDERED:**

17 **The Court hereby approves the parties' stipulation filed**  
18 **pursuant to Federal Rule of Civil Procedure 29. The**  
19 **parties represent that they are not seeking an extension**  
20 **of the discovery period but instead seek merely to**  
21 **complete depositions that were timely noticed prior to**  
22 **the close of discovery. Plaintiff's counsel shall file a**  
23 **status report on or before November 18, 2016 indicating**  
24 **which depositions identified in the stipulation have been**  
25 **completed. No discovery beyond completion of the**  
26 **depositions of the individual witnesses identified in the**  
**stipulation shall be permitted.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: October 28th, 2016