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7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 MAX RUHLMANN and ERIC SAMBOLD,  
11 Plaintiffs,  
12 v.

CASE NO.: 2:14-cv-00879-RFB-NJK

13 GLENN RUDOLFSKY, individually and DBA  
HOUSE OF DREAMS KAUAI and HOUSE OF  
14 DREAMS HAWAII; KIM D. RUDOLFSKY,  
AKA KIMI DAPOLITO, individually; and DBA  
15 HOUSE OF DREAMS KAUAI and HOUSE OF  
DREAMS HAWAII  
16 Defendants.

**PROPOSED AMENDED  
JOINT DISCOVERY PLAN  
AND SCHEDULING ORDER**  
  
(Docket No. 96)

17  
18 Plaintiffs, MAX RUHLMANN and ERIC SAMBOLD, by and through their undersigned  
19 counsel, and Defendants, MAX RUDOLFSKY and KIM RUDOLFSKY through their counsel,  
20 hereby respectfully submit a joint proposed Amended Discovery Plan and Scheduling Order  
21 pursuant to LR 26-1(b).

22 A. The parties conferred by letters, emails and telephone calls multiple times as  
23 required by Fed. R. Civ. P. 26(f). The parties agree to the following Amended Discovery Plan.

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1 B. Discovery Dates:

2 1. Discovery Cut-Off Date:

3 The parties shall have one hundred eighty (180) days from the date this report is filed in  
4 which to complete discovery. The proposed discovery cut-off date shall be on or before February  
5 13, 2017.

6 2. Amending the Pleadings and Adding Parties:

7 The parties agree that the last date for filing motions to amend the pleadings or add  
8 parties shall be no later than ninety (90) days prior to the close of discovery. The proposed date  
9 shall be on or before November 14, 2016.

10 3. FRCP 26(a)(2) Disclosures (Experts):

11 The parties agree that the last date for disclosure of expert witnesses shall be sixty (60)  
12 days before the close of discovery. The last date for disclosures shall be on or before December  
13 13, 2016.

14 4. Dispositive Motions:

15 The parties agree that the last date for filing dispositive motions shall be not later than  
16 thirty (30) days after the discovery cut-off date. The Dispositive motions shall be made on or  
17 before March 13, 2017.

18 5. Pretrial Order:

19 The parties agree that the Joint Pretrial Order shall be filed within thirty (30) days of the  
20 date set for filing of dispositive motions. The Order shall be filed on or before April 12, 2017.

21 6. FRCP 26 (a)(3) Disclosures:

22 The parties agree that the disclosures required by FRCP 26(a)(3) and any objections  
23 thereto shall be included in the pre-trial order on April 12, 2017.

24 7. Alternative Dispute Resolution. The parties have discussed the idea of settlement and  
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1 are amenable to settlement discussions. Plaintiffs have asked Defendants for documentation of  
2 rent amounts and a settlement proposal. After discovery of rental income has been provided, a  
3 settlement conference or mediation should be scheduled.

4 Discussions regarding settlement will continue once newly retained counsel for Defen-  
5 dants has had opportunity to more thoroughly review the case file.

6 8. Alternative Forms of Case Disposition. The parties have considered alternative forms  
7 of case disposition and do not feel that they would be appropriate for this case.

8 9. Electronic Evidence. Should this case proceed to trial, parties will be submitting  
9 electronic evidence.

10 DATED this 10<sup>th</sup> day of August, 2016.

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19 **NO FURTHER EXTENSIONS**  
20 **WILL BE GRANTED.**

21 IT IS SO ORDERED. LR 26-1(b)(10).

22 Dated: September 8, 2016

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25 NANCY J. KOPPE  
26 United States Magistrate Judge  
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