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11 *Attorneys for Plaintiff*

12 **IN THE UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 JESUS VILLA,

15 Plaintiff,

16 vs.

17 HIGH NOON WEST, LLC; COURTROOM  
 18 TELEVISION NETWORK LLC d/b/a  
 19 truTV; TURNER BROADCASTING  
 20 SYSTEM, INC.; TIME WARNER INC.;  
 21 DOES 1 through 20  
 22 ROE CORPORATION 1 through 20,  
 23 inclusive,

24 Defendants.

25 **CASE NO.: 2:14-cv-01107-RFB-VCF**

26 **STIPULATION TO AMEND INITIAL  
 27 DISCOVERY PLAN AND  
 28 SCHEDULING ORDER; PROPOSED  
 AMENDED DISCOVERY PLAN AND  
 SCHEDULING ORDER**

**[Special Scheduling Review Requested]**

29 Whereas, the Court has not ruled on the Motion to Dismiss by the Defendants, fully  
 30 briefed as of October 14, 2014;

31 Whereas, counsel for the parties are working on written discovery, have completed 2  
 32 depositions (one in New York) and are in the process of scheduling the depositions of Brent  
 33 Gauches, formerly with Defendant High Noon West, LLC, and that of Plaintiff, however  
 34 scheduling issues will not allow these depositions to be completed until at least June 2015, and  
 35 there are expected additional depositions to be noticed and taken;



**II.**  
**Scheduling Order**

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2 A. Pre-Discovery Disclosures. The parties have exchanged disclosures in or around  
3 November 4, 2014, as required by Fed.R.Civ.P. 26(a).

4 B. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

5 1. Subject of Discovery.

6 Discovery will be needed on the following subjects:

7 a. All claims set forth in Plaintiff's Complaint as well as the defenses  
8 relevant to the action.

9 b. The circumstances of the alleged accident.

10 2. Discovery Cut-Off Date(s).

11 Discovery will take 450 days, measured from September 2, 2014, which is the  
12 date Defendants filed their Motion to Dismiss, and means all discovery must be  
13 completed by **Tuesday, December 2, 2015**.

14 The parties agree to request 450 days because of a few extraordinary  
15 circumstances. Defendants High Noon West, LLC, Courtroom Television  
16 Network LLC d/b/a truTV, Turner Broadcasting System, Inc., and Time Warner  
17 Inc. have not answered Plaintiff's Amended Complaint due to a pending Motion  
18 to Dismiss Plaintiff's filed on September 2, 2014. Further, Plaintiff's medical  
19 records are still being updated. As it stands now, Plaintiff has eight medical  
20 providers, which will require extensive evaluation and depositions within the 450  
21 days requested.

22 Additionally, the parties plan to take the deposition of multiple witnesses and or  
23 agents, some of which may be located outside the State of Nevada and thus, will  
24 likely require travel.

25 3. Amending the Pleadings and Adding Parties.

26 The last date for filing motions to amend the pleading or to add parties shall not  
27 be later than 90 days prior to the close of discovery. In this action, the last date  
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for filing motions to amend the pleadings or add parties shall be **Wednesday, September 4, 2015.**

4. FRCP 26(a)(2) Disclosures (Experts).

The last day for disclosure of expert witnesses shall be 60 days before the discovery cut-off date. In this action, the last date for disclosure of experts shall be **Friday, October 5, 2015.**

The date for the disclosure of rebuttal expert witnesses shall be 30 days after the initial disclosure of experts. In this action, the last date for the rebuttal disclosure of experts shall be **Monday, November 5, 2015.**

5. Dispositive Motions.

The last date for filing dispositive motions shall not be later than 30 days after the discovery cut-off date. In this action, the last date for filing dispositive motions shall be **Thursday, January 7, 2016.**

6. Pretrial Order.

The joint pretrial order shall be filed no later than 30 days after the date set for filing dispositive motions. In this action, the joint pretrial order shall be filed on or before **Monday, February 8, 2016.** If dispositive motions are timely filed, the date for filing the Pretrial Order shall be suspended.

7. FRCP 26(a) Disclosures.

The disclosures required by FRCP 26(a)(3) and any objection thereto shall be included in the pretrial order.

C. Interim Status Report. In compliance with LR 26-3, an interim status report was to be filed on April 3, 2015, and is being filed on April 14, 2015 making the next one due **Friday, July 31, 2015,** and thereafter as the Court may provide, including one which is not later than sixty (60) days before the discovery cut-off.

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APPROVED AS TO FORM AND CONTENT:

Dated: April 14, 2015

Dated: April 14, 2015

SELMAN BREITMAN LLP

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**ORDER**

Good Cause appearing therefore, IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE  
DATED: April 15, 2015