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9 Attorneys for Defendants,  
*Robert Sorensen and L&N Transport, Inc.*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 \* \* \*

13 VENUS M. BOBADILLA, individually and as  
Guardian ad Litem of ZAVANNAH  
14 BOBADILLA, a minor, and FLOREMLISA N.  
MONTANO,

15 Plaintiffs,

16 vs.

17 ROBERT W. SORENSEN; L&N  
18 TRANSPORT, INC.; DOES 1 through 5, and  
ROE BUSINESS ENTITIES 1 through 5,  
19 inclusive,

20 Defendants.

Case No.: 2:14-cv-1233-JAD-CWH

**AMENDED  
STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(First Request)**

21 26238

22 IT IS HEREBY STIPULATED by and between Plaintiffs, VENUS M. BOBADILLA,  
23 individually and as Guardian ad Litem of ZAVANNAH BOBADILLA, a minor, and  
24 FLOREMLISA N. MONTANO, and Defendants, ROBERT W. SORENSEN and L&N  
25 TRANSPORT, Inc., by and through their respective counsel of record, pursuant to EDCR 2.35  
26 that due to a typographical error in the Stipulation and Order to Extend Discovery Deadlines  
27 (First Request) [12], the date for the Rebuttal Expert Designations should be amended as follows  
28 **(amended information appears in bold):**

1        1. Summary of Discovery Completed

2            All parties have provided initial witness lists and documents pursuant to N.R.C.P. 16.1 as  
 3 well as supplements thereto. Defendants have served written discovery requests to all Plaintiffs,  
 4 all of whom have served responses thereto. Depositions of eyewitness, Michael Penosa, and  
 5 Plaintiff, Venus Bobadilla, individually and as Guardian ad Litem for Zavannah Bobadilla, have  
 6 been taken.

7        2. Discovery Remaining

8            Depositions of Plaintiff, Floremliza N. Montano, Plaintiffs’ treating physicians and the  
 9 parties’ expert witnesses (once they are disclosed) need to be taken.

10       3. Reason Why Discovery Was Not Completed

11           At the time of the filing of this Stipulation, no discovery deadlines have passed. However, the  
 12 parties have scheduled a mediation with Honorable Gene Porter [Retired] for January 5, 2015  
 13 and wish to extend discovery deadlines by 60 days to allow time for settlement negotiations to  
 14 take place. The 60-day extension will allow the parties to avoid incurring the additional expense  
 15 of expert witnesses designations prior to the mediation in the event that settlement is reached.  
 16 Additionally, the parties believe that expert expenses will render settlement at the January 5,  
 17 2015 mediation more difficult to reach.

18       4. A Proposed Schedule for Completing Discovery

19           Accordingly, the parties respectfully request that this Court enter an order setting the  
 20 following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Discovery cutoff	February 24, 2015	April 24, 2015
Motions to amend pleadings and add parties	November 6, 2014	January 6, 2015
Expert Designations	December 26, 2014	February 26, 2015
<b>Rebuttal expert designations</b>	January 26, 2015	<b>March 30, 2015</b>
Interim status report	December 26, 2014	February 26, 2015

Dispositive motions	March 26, 2015	May 26, 2015
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Dated this 2nd day of December, 2014.

Dated this 2nd day of December, 2014.

BENSON & BINGHAM

THARPE & HOWELL, LLP

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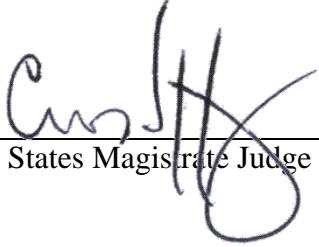
**ORDER**

Based upon the foregoing Stipulation of the parties hereto, and good cause appearing therefore,

IT IS HEREBY ORDERED that the discovery deadlines in the above entitled matter shall be Amended with respect to the Rebuttal Expert extended as set forth above.

IT IS SO ORDERED.

DATED this 12th day of December, 2014.

  
\_\_\_\_\_  
United States Magistrate Judge