

LAW OFFICES
GEORGE B. HIBBELER, P.C.
 871 CORONADO CENTER DRIVE #200
 HENDERSON, NV 89052
 Phone: (702) 804-4279 Fax: (702) 804-4781

1 GEORGE B. HIBBELER, ESQ.
 2 Nevada Bar No: 7746
 3 871 Coronado Center Dr., Ste. 200
 4 Henderson, NV 89052
 5 (702) 804-4279
 6 Fax: (702) 804-4781
 7 george@georgehibbeler.com
 8 *Attorney for Plaintiff*

9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

THOMAS LAYTON;
 Plaintiff,

vs.

GREEN VALLEY VILLAGE COMMUNITY
 ASSOCIATION, a Nevada not for profit
 Corporation dba GREEN VALLEY VILLAGE
 HOA; ASSURED REAL ESTATE, INC., a
 Nevada Corporation; TERRA WEST
 COLLECTIONS GROUP, LLC, a Nevada
 Limited Liability Company dba ASSESSMENT
 MANAGEMENT SERVICES; JOSEPH
 YAKUBIK, an individual; DOES I-X inclusive;
 ROE ; CORPORATIONS XI-XX inclusive;

Defendant(s).

Case No. 2:14-cv-01347-
 GMN-GWF

**STIPULATION AND
 ORDER TO CONTINUE
 THE SCHEDULED
 DEPOSITIONS AND
 EXTEND DEADLINE FOR
 COMPLETION OF
 DISCOVERY AND OTHER
 PENDING DEADLINES.
 (First Request)**

The parties herein, through their respective counsel, hereby stipulate and agree that the depositions of Michael Unger and Jospheh Yakubic scheduled for April 22, 2015 and the deposition of Thomas Layton scheduled for April 23, 2015 be continued. That the deadline for completion of discovery which is currently, April 24, 2015, be extended by sixty (60) days until June 25, 2015. That the pending date for filing dispositive motions also be extended sixty days until July 24, 2015. That the (Joint) Pretrial Order is required on or before August 25, 2015 or 30 days after the

1 decision deciding the dispositive motion. This is the parties first request for an extension of these
2 deadlines. This stipulation is made in good faith and is not anticipated or intended to cause any
3 delay to any party and good cause exists as follows:

4 (1) Interrogatories and requests for production of documents to Plaintiff, Thomas
5 Layton were served by Defendant on or about March 25, 2015. Responses are due on April 25,
6 2015. The depositions of Michael Unger and Jospheh Yakubic were scheduled for April 22, 2015
7 and the deposition of Thomas Layton was scheduled for April 23, 2015.

8 (2) No other discovery remains to be completed but the interrogatories, requests for
9 production of documents and depositions stated previously.

10 (3) The discovery remains to be completed because, despite the parties diligent
11 attempts to schedule the depositions during the months of March and April, due to conflicts in
12 their schedules, the parties were not able to agree to deposition dates. The deposition of Thomas
13 Layton was scheduled on April 23, 2015 and the depositions of Michael Unger and Joseph
14 Yakubic had been scheduled for April 22, 2015. However, both Michael Unger and Joseph
15 Yakubic are unavailable due to schedule conflicts on April 22, 2015 and Defendants contend that
16 they were not given sufficient notice for this deposition date. Plaintiff contends that the notice was
17 sufficient.

18 (4) Therefore, rather than burdening the court with unnecessary litigation of this issue,
19 the parties have agreed that the scheduled depositions be continued and tentatively rescheduled for
20 May 14th and 15th and the deadline of completion of discovery be extended for sixty (60) days to
21 June 25, 2015. That the pending date for filing dispositive motions also be extended sixty days
22 until July 24, 2015. That the (Joint) Pretrial Order is required on or before August 25, 2015 or 30

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

1 days after the decision deciding the dispositive motion.

2
3 **DATED** this 21 day of April 2015

4
5 **GEORGE B. HIBBELER, ESQ.**

GREENBERG TRAUIG, LLP

6 By: /s/ George B. Hibbeler, Esq.
George B. Hibbeler, Esq.
7 Nevada Bar No. 7746
871 Coronado Center Dr., Ste. 200
8 Henderson, Nevada 89012

By: /s/ Leslie S. Godfrey, Esq.
Tyler R. Andrews, Esq.
Nevada Bar No. 9499
Leslie S. Godfrey, Esq.
Nevada Bar No. 10229
Greenberg Traurig, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169

9 *Attorney for Plaintiff*

Attorney for Defendants

10
11
12
13
14 IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

Dated: April 23, 2015