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JOINTLY SUBMITTED

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

William Bridge, *on behalf of himself and all* :
others similarly situated, :

Plaintiff,

vs.

Credit One Bank, N.A.,

Defendant.

Case No.: 2:14-cv-01512-LDG-NJK

**STIPULATION AND [PROPOSED]
ORDER EXTENDING MEET AND
CONFER DEADLINE**

The parties to the above-captioned action respectfully jointly submit the following Stipulation and Proposed Order for the Court’s consideration and approval:

WHEREAS, on June 26, 2015, the Court denied without prejudice both Defendant’s motion for protective order and Plaintiff’s motion to compel (previously filed with the Court) and ordered the parties “to meet and confer to discuss their discovery disputes in light of the denial of Defendant’s motion to quash in the Eastern District of Pennsylvania” (Dkt. No. 93 at 4);

WHEREAS, on June 26, 2015, the Court further ordered that, “If they are unable to resolve the dispute in its entirety, the parties may bring renewed discovery motions no later than July 10, 2015,” and provided a briefing schedule for any such motions (Dkt. No. 93 at 4);

WHEREAS, on July 1, 2015, counsel for the parties (Brian G. Anderson on behalf of Defendant and Kyle J. McGee on behalf of Plaintiff) met in person and discussed their respective positions on the discovery disputes raised in Defendant’s motion for protective order and Plaintiff’s motion to compel in light of the Eastern District of Pennsylvania’s May 19, 2015 ruling and pursuant to the Court’s order (Dkt. No. 93);

WHEREAS, on July 2, 2015, counsel for the parties (Brian G. Anderson and R. Calder Huntington on behalf of Defendant and Kyle J. McGee and Diane Zilka on behalf of Plaintiff) conferred telephonically and further discussed their respective positions on the discovery disputes

1 raised in Defendant's motion for protective order and Plaintiff's motion to compel in light of the
2 Eastern District of Pennsylvania's May 19, 2015 ruling and pursuant to the Court's order (Dkt. No.
3 93);

4 WHEREAS, the parties are continuing to meet and confer in good faith to resolve the
5 disputes without further judicial intervention as this Court has directed and in an effort to fully
6 comply with this Court's directive;

7 NOW, THEREFORE, the parties, by their respective undersigned counsel, and subject to
8 this Court's approval, agree and stipulate as follows:

9 1. The parties shall conclude their meet and confer efforts regarding the discovery
10 disputes raised in Defendant's motion for protective order (Dkt. No. 63) and Plaintiff's motion to
11 compel (Dkt. No. 88) by July 17, 2015;

12 2. If they are unable to resolve the disputes in their entirety, the parties may bring
13 renewed discovery motions no later than July 24, 2015. Any such motions will be briefed
14 according to the following schedule: response due no later than July 31, 2015, and reply due no
15 later than August 7, 2015.

16 DATED: July 7, 2015

17 **IT IS SO STIPULATED:**

18 SHOOK & STONE, CHTD.

GRANT & EISENHOFER P.A.

19 /s/ Leonard H. Stone
LEONARD H. STONE (NV Bar No. 5791)
20 MICHAEL P. O'ROURKE (NV Baar No. 6764)
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21 Las Vegas, NV 89101

/s/ Adam J. Levitt
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22 *Attorneys for Plaintiff*

Attorneys for Plaintiff

23 HOLLAND & HART LLP

24 /s/ Brian G. Anderson
PATRICK J. REILLY (NV Bar No. 6103)
25 BRIAN G. ANDERSON (NV Bar No. 10500)
9555 Hillwood Drive, 2nd Floor
26 Las Vegas, NV 89134

IT IS SO ORDERED.
DATED: July 8, 2015

27 *Attorneys for Defendant*


28 NANCY J. KOPPE
United States Magistrate Judge