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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 JOSEPH LEWIS, )  
11 ) Case No. 2:14-cv-01683-RFB-GWF  
12 Plaintiff, )  
13 vs. ) **STIPULATION AND ORDER**  
14 DELTA AIR LINES, INC. ) **ALLOWING CERTAIN**  
15 Defendant. ) **DEPOSITIONS TO OCCUR**  
16 ) **AFTER THE DISCOVERY**  
17 ) **DEADLINE AND EXTENDING**  
18 ) **OTHER DEADLINES**  
19 ) **(Second Request)**

20 IT IS HEREBY STIPULATED AND AGREED by and between the parties'  
21 counsel of record that one, and possibly two, depositions may occur after the present  
22 discovery deadline of October 16, 2015. Specifically, the parties have agreed that  
23 because of scheduling conflicts, the deposition of JoAnne Guerrant, who is located in  
24 Atlanta, will occur on November 5, 2015. Additionally, Plaintiff wishes to depose  
25 Delta's in-house counsel, Kelly Giustina. While Defendant objects to the taking of this  
26 deposition, the parties have agreed to defer any deposition and any motion practice  
27 associated with the taking of this deposition until after the ruling on the privileged  
28 document issues raised in Plaintiff's Motion for an In Camera Review of Select Items  
from Defendant's Privilege Log (docket #41). Following the ruling, Defendant reserves

1 the right to seek a protective order regarding the deposition of Ms. Giustina, but agrees  
2 that it will not object to the deposition on the basis that it is occurring after the  
3 discovery deadline. This is the second request for any extension of discovery in this  
4 case.

5  
6 IT IS FURTHER STIPULATED AND AGREED that because the taking or  
7 possible taking of the foregoing depositions will not occur until November or thereafter,  
8 the dispositive motion deadline will be extended to December 18, 2015 and the deadline  
9 for filing a Joint Pretrial Order will be extended to January 18, 2016, or if a dispositive  
10 motion is filed, within 30 days after the Court's decision on any dispositive motions.  
11 This would be the second extension of these deadlines.

12  
13 This Stipulation and Order has been filed within 21 days of the current  
14 discovery deadline because the parties have just been able to finalize their agreements  
15 and arrangements regarding these matters and good cause exists for the filing within 21  
16 days.

17 STONE & WOODROW, LLP

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18  
19 /s/ Thatcher A. Stone, Esq.

/s/ Scott M. Mahoney, Esq.

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23 IT IS SO ORDERED:

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26 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

27 Dated: October 9, 2015