

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

JOINTLY SUBMITTED

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CODY HOCKENHULL, individually

2:14-cv-1750-RFB-GWF

Plaintiff,

vs.

JACK SCHLUNEGER, JR., individually;  
LANDFORCE CORPORATION, a  
California Corporation, DOES I-X, and  
ROE Corporations I-X, inclusive,

Defendants.

**STIPULATION TO EXTEND THE DATE FOR SUBMISSION OF THE JOINT PRE-TRIAL ORDER AND TO SCHEDULE A SETTLEMENT CONFERENCE (Second Requested Modification)**

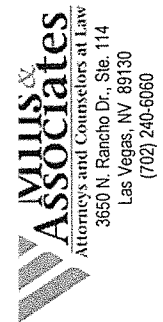
Plaintiff Cody Hockenhull and Defendants Jack Schluneger, Jr. and Landforce Corporation, by and through their respective counsel, and pursuant to LR 26-4, stipulate to modify their discovery plan as follows:

**(a) Discovery Completed.**

All discovery is complete. The operative Stipulated Discovery and Scheduling Order (First Request) dated February 2, 2015 [ECF 15] provides as follows:

- Last day of discovery: Closed June 22, 2015
- Last day to amend/add: Closed March 23, 2015
- Initial Expert Disclosure: Closed April 23, 2015
- Rebuttal Expert Disclosure: Closed May 26, 2015
- Dispositive Motions filed: Closed July 22, 2015
- Joint Pre-Trial Order: August 21, 2015

**STIPULATION TO EXTEND THE DATE FOR SUBMISSION OF THE JOINT PRE-TRIAL ORDER AND TO SCHEDULE A SETTLEMENT CONFERENCE (SECOND REQUESTED MODIFICATION)**



1           **(b) Discovery That Remains To Be Completed**

2           The only remaining item on the Scheduling Order that is incomplete is the  
3 submission of the Joint Pre-Trial Order. The parties seek to extend that deadline in  
4 order to have the court rule on Defendant's Motion to Exclude Evidence #1 [ECF 30]  
5 and then subsequently participate in a settlement conference.  
6

7           **(c) The Reason Why The Deadline Should Be Extended**

8           After discovery closed on June 22, 2015, Plaintiff Cody Hockenhull's doctor  
9 drafted a report dated July 16, 2015 recommending future medical care that he opines  
10 is related to the subject accident. On July 24, 2015, Plaintiff disclosed his future  
11 damages claims to Defendants. On August 17, 2015, Defendants filed a Motion To  
12 Exclude these damages claims, stating that they were untimely disclosed. [ECF 30].

13           Upon the filing of this motion, the parties met and conferred. They agreed to  
14 participate in a Settlement Conference.

15           The parties agree that this Court should extend the deadline for filing the Joint  
16 Pre-Trial Order until after this Court rules on the pending Motion to Exclude Evidence  
17 [ECF 30] and until after the Settlement Conference has been completed.  
18

19           **(d) A Proposed Schedule For Completing Remaining Tasks**

20           1.       The parties hereby stipulate that the Discovery Plan and Scheduling Order  
21 be modified a second time to extend the deadline for the Joint Pre-Trial Order.

22           2.       The parties stipulate that the matter be submitted to a Settlement  
23 Conference before the Magistrate Judge but not before the court has ruled on  
24 Defendant's Motion to Exclude Evidence #1 [ECF 30].

25           3.       The parties further agree that the due date of filing the Joint Pre-Trial  
26 Order shall be extended until 30 days after the court has decided Defendant's Motion to

27       ///

28       ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Exclude Evidence #1 and the Settlement Conference has been held.

Dated: August 20, 2015

Dated: August 20, 2015

RICHARD HARRIS LAW FIRM

MILLS & ASSOCIATES

/s/ AJ Sharp

/s/ Michael C. Mills

\_\_\_\_\_  
RICHARD HARRIS, ESQ.  
Nevada Bar No. 000505  
A.J. SHARP, ESQ.  
Nevada Bar No. 11457  
801 South Fourth Street  
Las Vegas, NV 89101  
Attorney for Plaintiff,  
Cody Hockenhill

\_\_\_\_\_  
MICHAEL C. MILLS, ESQ.  
Nevada Bar No. 003534  
3650 N. Rancho Drive, #114  
Las Vegas, Nevada 89130  
Attorney for Defendants,  
Jack Schluneger, Jr., and  
Landforce Corporation

IT IS SO ORDERED this 25th day of August, 2015.

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

