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 THE CHARTER OAK FIRE
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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 L.A. PACIFIC CENTER, INC., a Nevada
 corporation,

CASE NO.: 2:14-cv-01977-GMN-VCF

11 Plaintiffs,

12 vs.

**STIPULATION AND ORDER TO
 EXTEND CERTAIN DISCOVERY
 DEADLINES**

13 THE CHARTER OAK FIRE INSURANCE
 14 COMPANY, a Connecticut corporation,

**** First Request ****

15 Defendant.

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 18 Pursuant to Local Rule 26-4, Plaintiff L.A. Pacific Center, Inc. ("Plaintiff") and Defendant
 19 The Charter Oak Fire Insurance Company ("Charter Oak") hereby submit the following
 20 Stipulation and Order to Extend Time to Complete Discovery. While Plaintiff reserves the right
 21 to file a motion to extend all remaining discovery deadlines, the purpose of this request is to
 22 extend the current discovery deadline by 30 days solely to facilitate the deposition of Plaintiff's
 23 person most knowledgeable which was properly noticed for August 31, 2015, but needs to be
 24 rescheduled to accommodate scheduling issues. The parties do not agree that any other deadlines
 25 (including the current discovery deadline for any other discovery) need to be extended.

26 **A. Discovery Completed**

27 The parties exchanged their initial disclosures as required by Local Rule 26-1(a)(2).
 28 Charter Oak served its expert disclosure on June 9, 2015. Charter Oak issued subpoenas to non-

1 parties American Leak Detection, Arroyo Engineering Consultants and James G. Johnson,
2 PhD/Professional Loss Services. Charter Oak served its First Supplemental Disclosure Statement
3 on August 17, 2015, which included the documents received to date in response to the
4 aforementioned subpoenas. Charter Oak also served written discovery on Plaintiff on July 27,
5 2015. Responses to such written discovery are due on August 31, 2015. Charter Oak also
6 noticed the deposition of Plaintiff's person most knowledgeable for August 31, 2015. Charter
7 Oak filed its Motion for Summary Judgment on August 13, 2015.

8 **B. Discovery Remaining**

9 The deposition of Plaintiff's person most knowledgeable needs to be completed.
10 Responses to the subpoenas are still due from Arroyo Engineering Consultants and James G.
11 Johnson, PhD/Professional Loss Services. Responses to written discovery to Plaintiff are still
12 due. Charter Oak does not believe that any additional discovery is necessary and has already filed
13 its Motion for Summary Judgment which is currently pending before the Court. Plaintiff reserves
14 the right to file a motion to extend all remaining discovery deadlines to conduct additional
15 discovery.

16 **C. Reasons Why Discovery Not Completed**

17 The deposition of Plaintiff's person most knowledgeable which is currently set for August
18 31, 2015, needs to be rescheduled to a time convenient to counsel and the parties. There is
19 insufficient time under the existing scheduling order to reschedule this deposition before the
20 current discovery deadline of September 8, 2015. The parties request an additional 30 days to
21 complete the deposition of Plaintiff's person most knowledge to accommodate scheduling issues
22 including an upcoming trial in a separate matter being tried by Charter Oak's counsel.

23 **D. Proposed Schedule for Completion of Discovery**

24		<u>Old Deadline</u>	<u>New Deadline</u>
25	Amend Pleadings & Adding Parties	6/10/15	Passed
26	Disclosure of Experts and Reports	6/10/15	Passed
27	Disclosure of Rebuttal Experts and Reports	7/11/15	Passed
28	Interim Status Reports	7/11/15	Filed

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Close of Discovery (except the depositions of Plaintiff's person most knowledgeable)	9/8/15	9/8/15
Close of Discovery (deposition of Plaintiff's person most knowledgeable)	9/8/15	10/8/15
Dispositive Motions	10/8/15	10/8/15
Joint Pre-Trial Order	11/9/15	11/9/15

WHEREFORE, the parties respectfully request that the Court extend the discovery deadlines as outlined above.

Respectfully submitted this 28th day of August, 2015.

SNELL & WILMER L.L.P.

LAW OFFICES OF STEVEN J. PARSONS

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ORDER

IT IS SO ORDERED.

22nd September
DATED this ___ day of ~~August~~, 2015.



U. S. MAGISTRATE JUDGE