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8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 ROOSEVELT WILLIAMS, individually,
 12 Plaintiff,

13 vs.

14 UNITED SERVICES AUTOMOBILE
 15 ASSOCIATION; DOES 1 through 10, ROE
 16 ENTITIES 11 through 20, inclusive jointly
 and severally,
 17 Defendants.

CASE NO. 2:14-cv-02092-GMN-GWF

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY DEADLINE**

(SECOND REQUEST)

18 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective
 19 counsel of record, hereby stipulate and request that this Court extend discovery in the
 20 above-captioned case ninety (90) days, up to and including December 11, 2015. In
 21 addition, the parties request that the dispositive motions and pretrial order deadlines be
 22 extended for an additional ninety (90) days as outlined herein. In support of this
 23 Stipulation and Request, the parties state as follows:
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- 25 1. On December 11, 2014, Defendant removed the instant action to Federal
- 26 Court.
- 27 2. On December 11, 2014, Defendant filed its Answer to Plaintiff's Complaint
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with Federal Court.

3. On December 29, 2014, Defendant filed its Statement Regarding Removal.

4. On February 2, 2015, the parties prepared and the Court then entered a Discovery Plan and Scheduling Order (the Order).

5. On February 3, 2015, Plaintiff served his initial document and witness disclosures.

6. On March 10, Defendant served it's initial document and witness disclosures.

7. On March 20, 2015, Defendant served written discovery on Plaintiff.

8. On April 16, 2015, Plaintiff served written discovery on Defendant.

DISCOVERY REMAINING

1. Defendant will take the deposition of Plaintiff.

2. Plaintiff will take the deposition of Defendant's representatives.

3. The parties will collect Plaintiff's medical and billing records.

4. The parties will take the depositions of the designated expert witnesses.

5. The parties will take the depositions of Plaintiff's medical providers.

6. The parties will take the depositions of any and all other witnesses garnered through discovery.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties are in the process of serving and responding to written discovery requests. The parties anticipate that Defendant will need to collect Plaintiff's medical records once medical authorizations are provided to Defendant. Since Plaintiff is alleging

1 significant neurological injuries as a result of the accident, in addition to neck and back
2 injuries, it will be necessary for all medical records to be obtained in order for Defendant
3 to adequately assess expert retention for this case. The parties also anticipate Plaintiff
4 will request to take the deposition of one or more of Defendant's employees involved in
5 handling Plaintiff's underinsured motorist claim ("UIM claim"). Defendant's employees
6 are located out of state, so it will require travel by the parties for the depositions. The
7 parties will also need to schedule the depositions of Plaintiff, Plaintiff's treating physicians
8 as well as the depositions of any expert witnesses.

9 Also, Counsel for Defendants has had an unexpected death in his family that has
10 and will significantly limit his availability. In addition to these family obligations, counsel
11 for defendant has been involved in preparing motions for summary judgment in *Shimeka*
12 *Graham v. City of North Las Vegas, 2-13-cv-1815-KJD-VCF* and *Plank v. Las Vegas*
13 *Metropolitan Police Department, 2-12-cv-02205-JCM-PAL*. Additionally, counsel for
14 defendants is preparing an opening brief in *Koiro v. Catanese, Appeals Docket No. 14-*
15 *17514*. Counsel for defendants has been preparing for oral argument in the *Nevada*
16 *Supreme Court in the Eighth Judicial District Court v. Ronald Fox, No. 66114*. Finally
17 counsel will be traveling in June and July 2015 for multiple out of state depositions.

18 The parties have conferred regarding discovery for this case and it appears the
19 parties can work together to complete the discovery requested with additional time
20 allowed by this court.

21 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4
22 governs modifications or extension of this discovery plan and scheduling order. Any
23 stipulation or motion must be made no later than twenty-one (21) days before the
24 expiration of the subject deadline, and comply fully with LR 26*-4.

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1 The following is a list of the current discovery deadlines and the parties' proposed
 2 extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	September 11, 2015	December 11, 2015
Extension of Discovery Deadline	June 17, 2015	September 17, 2015
Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	July 10, 2015	October 9, 2015
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	August 11, 2015	November 11, 2015
Interim Status Report	July 10, 2015	October 9, 2015
Dispositive Motions	October 12, 2015	January 12, 2016, or at least thirty (30) days after the close of discovery
Joint Pretrial Order	November 10, 2015	February 10, 2015, or at least thirty (30) days after the decision of last Dispositive Motions

15 This Request for an extension of time is not sought for any improper purpose or
 16 other purpose of delay. Rather, it is sought by the parties solely for the purpose of
 17 allowing sufficient time to conduct discovery in this case and adequately prepare their
 18 respective cases for trial.

19 This is the First request for extension of time in this matter. The parties
 20 respectfully submit that the reasons set forth above constitute compelling reasons for the
 21 short extension.
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