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10 UNITED STATES DISTRICT COURT
 11 FOR THE DISTRICT OF NEVADA

12 MARY TURNER, an individual,
 13
 Plaintiff,

Case No.: 2:14-cv-02108-GMN-GWF

14 vs.

STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO COMPLETE
 DISCOVERY

15 RIVIERA OPERATING CORPORATION
 16 d/b/a RIVIERA HOTEL & CASINO; and
 17 DOES and ROES 1-100, inclusive.

(FIRST REQUEST)

18 Defendant.
 19

20 Defendant Riviera Operating Corporation d/b/a Riviera Hotel & Casino (“Riviera”), and
 21 Plaintiff Mary Turner (“Turner”), by and through their respective undersigned counsel, hereby
 22 submit this first joint request for a short extension of the discovery cut-off period and related
 23 deadlines as contained in the Discovery Plan and Scheduling Order (Doc #15). This request is
 24 submitted pursuant to LR 6-1, 6-2, 7-1 and 26-4.

25 Good cause exists to extend the discovery cut-off in this matter. The parties have both
 26 served and responded to written discovery. Additionally, Plaintiff has taken the deposition of two
 27 witnesses. However, additional time is needed. The parties appeared for and attended an Early
 28 Neutral Evaluation conference on April 27, 2015 whereby Magistrate Hoffman ordered the parties

1 to submit a Joint Status Report in thirty (30) days with an updated status of the matter. (Dkt. #19).
2 During that period, the parties have been working on a resolution. Additional time is necessary to
3 complete discovery as a result. Furthermore, defense counsel is going to be out of the country, and
4 additional time is needed to depose Plaintiff as well as any additional witnesses.

5 The current discovery-cut-off date is June 10, 2015. Therefore, this first joint request for an
6 extension of time is based upon the following:

7 **I. DISCOVERY COMPLETED TO DATE**

8 The parties have exchanged Initial Disclosures. Plaintiff propounded written discovery on
9 Defendant on January 20, 2015 and January 21, 2015, including Interrogatories and Request for
10 Production of Documents. The parties mutually agreed to extend the time to respond to said
11 written discovery in furtherance of settlement discussions. Defendant submitted its responses on
12 April 24, 2015 and is presently obtaining additional information to supplement responses pending
13 that the parties agree on a protective order and confidentiality agreement.

14 Defendant propounded written discovery on Plaintiff on January 26, 2015, including
15 Interrogatories and Requests for Production of Documents. Again, the parties mutually agreed to
16 extend the time to respond to said written discovery in furtherance of settlement discussions. On
17 April 14, 2015, Plaintiff provided responses to Defendant's Interrogatories only.

18 On May 13, 2015, Plaintiff deposed two former management employees of Defendants.

19 **II. REMAINING DISCOVERY TO BE COMPLETED**

20 Defendant will supplement its discovery responses subject to a protective order and
21 confidentiality agreement executed by the parties. Plaintiff will provide Defendant with responses
22 to its Request for Production of Documents. Additionally, Defendant intends to depose Plaintiff
23 and Plaintiff intends to depose Riviera's former Human Resource Director as well as an additional
24 former employee.

25 **III. REASONS DISCOVERY CANNOT BE COMPLETED WITHIN THE**
26 **ORIGINAL DEADLINE**

27 The parties spent a significant time at the outset of this matter to come to an early
28 resolution. The parties' require additional time to (1) resolve any minor discovery disputes related

1 to Defendant's supplemental discovery responses; (2) depose Plaintiff due to defense counsel being
2 out of the country; and (3) depose additional former Riviera employees. Additionally, the parties
3 are working on whether resolution of this matter is possible pursuant to Magistrate Hoffman's
4 Order. (Dkt. #19.)

5 **IV. REVISED PROPOSED DISCOVERY PLAN**

6 All discovery in this case will be conducted in accordance with the Federal Rules of Civil
7 Procedure and applicable Local Rules of this District Court. The parties propose to the Court the
8 following cut-off dates:

- 9 **A. Discovery Cut-off Date:** The discovery cut-off deadline shall be **August 10, 2015**.
- 10 **B. Dispositive Motions:** Dispositive motions shall be filed by **September 9, 2015**
11 (thirty (30) days after the discovery cut-off date of August 10, 2015) in accordance with Local
12 Rule 26-1(e)(4).
- 13 **C. Motions in Limine/Daubert Motions:** Pursuant to Local Rule 16-3(b), any
14 motions in limine, including *Daubert*-type motions, shall be filed and served thirty (30) days prior
15 to trial. Oppositions shall be filed and served and the motion submitted for decision fourteen (14)
16 days thereafter. Reply briefs shall only be allowed with leave of court, unless the District Judge
17 issues an order with a different deadline or briefing schedule.
- 18 **D. Pretrial Order:** The Pretrial Order shall be filed no later than **October 9, 2015**
19 (thirty (30) days after the deadline for filing dispositive motions date of September 9, 2015), in
20 accordance with Local Rule 26-1(e)(5). In the event dispositive motions have been filed, the
21 Pretrial Order shall be suspended until thirty (30) days after a decision of the dispositive motions or
22 further order of the Court.
- 23 **E. Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
24 26(a)(3), and any objections thereto, shall be included in the final pretrial order in accordance with
25 Local Rule 26-1(e)(6).

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1 **F. Extension or Modification of the Discovery Plan and Scheduling Order:** In
2 accordance with Local Rule 26-4, any motion or stipulation to extend a deadline set forth in this
3 discovery plan and scheduling order shall be received by the Court no later than twenty-one (21)
4 days before the expiration of the subject deadline.

5
6 Dated this 20th day of May, 2015.

Dated this 20th day of May, 2015.

7 NELSON LAW

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

8 /s/ Sharon L. Nelson

/s/ Dana B. Krulewitz

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11 *Attorney for Plaintiff*

*Attorneys for Defendant Riviera Operation
Corporation d/b/a Riviera Hotel & Casino*

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14
15 **ORDER**

16 IT IS SO ORDERED.

17 
18 _____
19 UNITED STATES MAGISTRATE JUDGE

20 May 21, 2015

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28 Dated _____