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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAYMOND WRIGHT, an individual and)	
resident of Nevada; on behalf of himself and)	CASE NO. 2:15-CV-56-JAD-GWF
all similarly situated individuals,)	
)	
Plaintiff,)	
)	
vs.)	
)	
JACOB TRANSPORTATION, LLC, a)	
Nevada Limited Liability Company, dba)	
Executive Las Vegas,)	
)	
Defendant,)	
_____)	

**STIPULATION AND ORDER TO STAY DISCOVERY /
SUBMISSION OF DISCOVERY SCHEDULE**

IT IS HEREBY STIPULATED AND AGREED, by and between, Plaintiff Raymond Wright, through his undersigned counsel, and Defendant Jacob Transportation Services, LLC, though its undersigned counsel, that, other than initial disclosures required by Fed. R. Civ. P. 26, discovery in this matter be stayed, and that submission of a proposed Discovery Scheduling Order be stayed, until **JULY 6, 2015**.

In support of this Stipulation, the parties state the following. The parties enter into this Stipulation because this case presents allegations under the Fair Labor Standards Act and seeks to proceed as a collective action, because this case is in the early stages of litigation, and because the Court has scheduled a hearing to take place on June 29, 2015, to determine whether to grant or deny Plaintiff’s motion for conditional certification. Such motion, by seeking conditional certification, has the potential to substantially impact the discovery, and the scope of discovery, in which the parties will need to engage. Such certification has the potential to increase the number of claimants, and the issues upon which discovery may need to occur. Such certification will also determine whether the current Plaintiff will proceed solely on his own claims, or

1 whether additional issues must be explored in light of such Plaintiff proceeding in a
2 representative capacity on behalf of others.

3 In addition, FLSA actions raise issues concerning attorney fees, liquidated damages, and
4 other damages that can increase the difficulty of resolution if the parties engage in substantial
5 discovery of the initial party-plaintiffs prior to a proceeding that has the potential to shed light of
6 the scope of discovery that will be needed. Staying discovery for this limited period will avoid
7 duplication of discovery procedures that might otherwise occur. The requested deadline for
8 submitting a proposed discovery scheduling order to the Court is set at one week after the June
9 29, 2015 hearing that will occur before the Court. All parties are in agreement regarding this
10 limited stay. No prejudice will be caused in light of the hearing date already being set, and that
11 such hearing will occur within a reasonable period. The stay is only of discovery, and the parties
12 remain free to raise other pertinent matters before the Court or otherwise engage in preparation
13 of the claims.
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16 This Stipulation is submitted in good faith, and in the interest of judicial economy. It
17 complies with Federal Rule of Civil Procedure 1 in that it seeks an “inexpensive” determination
18 of the issues in the case while still serving the interest of “speedy” determination since the date
19 of hearing on June 29, 2015 has already been set and is known. Once the hearing occurs, the
20 parties will have one week to submit their proposed Discovery Scheduling Order.
21

22 DATED: April 3, 2015.

DATED: April 3, 2015.

LOVATO LAW FIRM, P.C.

24 /s/ David Grounds

/s/ Mario Lovato

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Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.

DATED: April 13, 2015.


UNITED STATES MAGISTRATE JUDGE