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8
 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 TERESITA GONZALES, an individual;
 12
 Plaintiff,
 13
 vs.
 14 STATE FARM MUTUAL AUTOMOBILE
 INSURANCE COMPANY, an Illinois
 15 Company; DOES I through X; and ROE
 CORPORATIONS XI through XX,
 16
 Defendants.

CASE NO.: 2:15-cv-00428-GMN-CWH

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES
 (FIRST REQUEST)**

**SUBMITTED IN COMPLIANCE WITH LR
 26-1(e)**

18 Defendant, State Farm Mutual Automobile Insurance Company (“State Farm”), and
 19 Plaintiff, Teresita Gonzales, by and through their respective counsel, and pursuant to
 20 Local Rule 26-4, stipulate to modify their discovery plan as follows:

- 21 1. Plaintiff filed her Complaint in the District Court for Clark County, Nevada on
- 22 February 5, 2015. State Farm removed the action to this Court on March 11, 2015 (Doc.
- 23 1).
- 24 2. State Farm filed its answer to the Complaint on March 11, 2015 (Doc. 5).
- 25 3. The parties held their F.R.C.P. 26 conference on March 31, 2015 and filed
- 26 their initial Stipulated Discovery Plan and Scheduling Order in compliance with F.R.C.P.
- 27 26(f) and LR 26-1(e) on April 1, 2015 (Doc. 10). In this initial discovery plan, the parties
- 28 agreed to the following dates:

1 Last day of discovery: September 15, 2015
2 Last day to amend/add: June 26, 2015
3 Initial expert disclosure: July 27, 2015
4 Rebuttal expert disclosure: August 26, 2015
5 Dispositive motions filed: October 23, 2015
6 Joint pre-trial order: November 20, 2015

7 This initial discovery plan was signed by United States Magistrate Judge Carl W.
8 Hoffman on April 21, 2015 (Doc. 12).

9 4. In compliance with Local Rule 26-4, the parties provide the following
10 information regarding the discovery status:

11 a. Discovery Completed: The parties have exchanged initial disclosures
12 of witnesses and documents, have served written discovery and conducted Plaintiff's
13 deposition. State Farm is still in the process of independently obtaining Plaintiff's
14 voluminous medical records from her medical providers arising out of the subject accident
15 and providing them to State Farm's medical expert for review.

16 b. Discovery that remains to be completed: Additional time is needed for State
17 Farm to obtain Plaintiff's relevant pre and post accident medical records. Additional
18 depositions of Plaintiff's treating physicians may also be necessary, depending on further
19 information provided in records that State Farm is still in the process of obtaining.
20 Additional time is also needed for State Farm to conduct Plaintiff's Independent Medical
21 Examination.

22 c. Reasons why discovery was not completed: The parties' current Discovery
23 Plan and Scheduling Order (Doc. 12) does not provide sufficient time to allow State Farm
24 to obtain all of Plaintiff's medical records, or to complete Plaintiff's Independent Medical
25 Examination. Additional time for discovery is necessary to avoid prejudice and to
26 facilitate a fair and just investigation of Plaintiff's alleged injuries and with respect to
27 Plaintiff's claims against State Farm.

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1 d. Proposed schedule for completion of remaining discovery (extension of
2 remaining deadlines by approximately 60 days):

3 Last day of discovery: November 13, 2015
4 Last day to amend/add: August 25, 2015
5 Initial expert disclosure: September 25, 2015
6 Rebuttal expert disclosure: October 23, 2015
7 Dispositive motions filed: December 22, 2015
8 Joint pre-trial order: January 19, 2016

9 DATED this 2nd day of July, 2015.

10 LEWIS BRISBOIS BISGAARD & SMITH LLP

11 By /s/ Danielle C. Miller
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21 DATED this 2nd day of July, 2015.

22 JAMES KWON, LLC

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 6, 2015