

1 LEONARD T. FINK, ESQ.  
 Nevada Bar No. 6296  
 2 SHARON A. PARKER, ESQ.  
 Nevada Bar No. 8274  
 3 **SPRINGEL & FINK LLP**  
 10655 Park Run Drive, Suite 275  
 4 Las Vegas, Nevada 89144  
 Telephone: (702) 804-0706  
 5 Facsimile: (702) 804-0798  
 E-Mail: *lfink@springelfink.com*  
 6 *sparker@springelfink.com*

7 *Attorneys for Defendant*  
 8 *PARAMOUNT BUILDING SOLUTIONS, LLC*

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

11 \*\*\*

12	ROSA FREEDMAN, an individual,	)	CASE NO.: 2:15-cv-00474-JAD-CWH
13	Plaintiff,	)	
14	vs.	)	<b>STIPULATION AND ORDER TO EXTEND</b>
15	THE VONS COMPANIES, INC., a Michigan	)	<b>DISCOVERY DEADLINES</b>
16	corporation; PARAMOUNT BUILDING	)	<b>(FIRST REQUEST)</b>
17	SOLUTIONS, LLC, a Delaware corporation; YET	)	
18	UNKNOWN EMPLOYEE AND/OR	)	
19	EMPLOYEE; DOES I through V, inclusive,	)	
20	Defendants.	)	
21	_____	)	
22	THE VONS COMPANIES, INC.	)	
23	Cross-Claimant,	)	
24	vs.	)	
25	PARAMOUNT BUILDING SOLUTIONS and	)	
26	DOES I through V, inclusive,	)	
27	Cross-Defendant.	)	
28	_____	)	

25 ///  
 26 ///  
 27 ///  
 28 ///



1           10.    Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,  
2 dated May 12, 2015;

3           11.    Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,  
4 dated May 14, 2015;

5           12.    Defendant, The Vons Companies, Inc.'s Supplemental list of Witnesses and Exhibits,  
6 dated May 19, 2015;

7           13.    Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,  
8 dated May 26, 2015;

9           14.    Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,  
10 dated May 29, 2015;

11          15.    Defendant, The Vons Companies, Inc.'s Supplemental List of Witnesses and Exhibits,  
12 dated June 24, 2015;

13          16.    Defendant, Paramount Building Solutions, LLC's Initial List of Witnesses and Exhibits  
14 dated July 13, 2015.

15           **Written Discovery:**

16          1.     Defendant, The Vons Companies, Inc.'s Requests for Productions of Documents to  
17 Plaintiff, dated March 27, 2015;

18          2.     Defendant, The Vons Companies, Inc.'s Interrogatories to Plaintiff, dated March 27,  
19 2015;

20          3.     Plaintiff's Request for Production of Documents and Materials to Defendant, The Vons  
21 Companies, dated April 20, 2015;

22          4.     Plaintiff's Responses to Defendant, The Vons Comp anise, Inc.'s Interrogatories, dated  
23 April 30, 2015;

24          5.     Plaintiff's Responses to Defendant, The Vons Companies, Inc.'s Requests for Production  
25 of Documents, dated April 30, 2015;

26          6.     Defendant, The Vons Companies, Inc.'s Responses to Plaintiff's Request for Production  
27 of Documents and Materials, dated May 15, 2015;

28          ///

1 7. Plaintiff's Request for Production of Documents and Materials to Defendant, Paramount  
2 Building Solutions, LLC, dated May 27, 2015;

3 8. Defendant, Paramount Building Solutions, LLC's Responses to Plaintiff's Requests for  
4 Production of Documents and Materials, dated July 13, 2015.

5 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

6 Deposition of Plaintiff, Plaintiff's medical providers, several percipient witnesses and  
7 representatives of Defendants remain to be taken. Initial expert disclosures, rebuttal expert disclosures,  
8 and depositions of experts as the parties may desire. Other discovery may prove necessary as new  
9 information regarding this case is obtained.

10 **C. WHY DISCOVERY WAS NOT COMPLETED**

11 The parties have conducted discovery including subpoenaing Plaintiff's medical records,  
12 exchanging documents and written discovery. However, Plaintiff is claiming substantial personal  
13 injuries and loss of future earning capacity. Due to scheduling conflicts and the amount of medical  
14 documentation which has been subpoenaed and is being reviewed, the parties have been unable to  
15 schedule the deposition of Plaintiff or necessary percipient witnesses prior to the expert disclosure  
16 deadline. Such deposition testimony is necessary for the experts to complete their analysis.

17 **D. PROPOSED SCHEDULE FOR COMPLETION OF DISCOVERY**

18 The following is a proposed schedule for the completion of discovery:

19 1. Last day to complete discovery:

20 Current Setting: September 14, 2015

21 Proposed Extension: December 14, 2015

22 2. Last day for rebuttal expert disclosures:

23 Current Setting: August 17, 2015

24 Proposed Extension: November 16, 2015

25 3. Last day to file dispositive motions:

26 Current Setting: October 14, 2015

27 Proposed Extension: January 11, 2016

28 ///

1 4. Last day to file Joint Pre-Trial Order:

2 Current Setting: November 13, 2015

3 Proposed Extension: February 11, 2016

4 There are currently no issues which the parties are aware regarding discovery of electronically  
5 stored information or claims or privilege/protection of trial preparation materials.

6 There are currently no changes which should be made in the limitations on discovery imposed  
7 by the federal or local rules of practice and no additional orders that this Court should issue at the time.

8 DATED this 20<sup>th</sup> day of July, 2015.

DATED this 20<sup>th</sup> day of July, 2015.

9 THE GALLIHER LAW FIRM

KAHLE & ASSOCIATES

10  
11 By:

/s/ [Signature]  
KEITH E. GALLIHER, JR., ESQ.  
Nevada Bar No.220  
CHRISTY LYN M. GALLIHER, ESQ.  
Nevada Bar No. 8460  
1850 E. Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
Attorneys for PLAINTIFF

By:

[Signature]  
TAMELA L. KAHLE, ESQ.  
Nevada Bar No. 0558  
7660 West Sahara Avenue, Ste. 110  
Las Vegas, Nevada 89117  
Attorneys for Defendant / Cross-Claimant  
THE VONS COMPANIES, INC.

16 DATED this 20<sup>th</sup> day of July, 2015.

17 SPRINGEL & FINK LLP

18  
19 By:

/s/ [Signature]  
LEONARD T. FINK, ESQ.  
Nevada Bar No. 6296  
SHARON A. PARKER, ESQ.  
Nevada Bar No. 8274  
10655 Park Run Drive, Ste. 275  
Las Vegas, Nevada 89144  
Attorneys for Defendant / Cross-Defendant  
PARAMOUNT BUILDING SOLUTIONS,  
LLC

24 IT IS SO ORDERED.

25 DATED July 24, 2015.

26  
27  
28 [Signature]  
UNITED STATES MAGISTRATE JUDGE