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 6 Attorneys for Defendant ALBERTSON’S LLC

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

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|---|--|
| <p>9 NAKIA BASKERVILLE, Individually,</p> <p>10 <b>Plaintiff,</b></p> <p>11 vs.</p> <p>12 ALBERTSON’S, LLC, a foreign limited liability<br/>         13 company; NEW ALBERTSON’S, INC., a foreign<br/>         corporation; ALBERTSON’S HOLDINGS, LLC,<br/>         14 a foreign limited liability Company; DOES I-X;<br/>         and ROE CORPORATIONS I-XX, inclusive,</p> <p>15 <b>Defendants.</b></p> | <p>CASE NO.: 2:15-cv-00902-JAD-VCF</p> |
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17 **STIPULATION AND ORDER TO EXTEND THE DISCOVERY**  
 18 **AND PRE-TRIAL DEADLINES (FIRST REQUEST)**

19 COME NOW Plaintiff NAKIA BASKERVILLE, by and through her attorney, David J.  
 20 Martin, Esq. of HENNESS & HAIGHT; and Defendant ALBERTSON’S, LLC by and through its  
 21 attorneys, Kym Samuel Cushing, Esq. and Raymond E. McKay, Esq. of WILSON, ELSER,  
 22 MOSKOWITZ, EDELMAN & DICKER LLP; and hereby stipulate to extend all current discovery  
 23 and pre-trial deadlines by approximately 30 days.

24 **A. Good cause exists for extending the discovery and pre-trial deadlines.**

25 Good cause exists for extending the current discovery and pre-trial deadlines. LR 26-4  
 26 provides in pertinent part:  
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1 place, with the deadline for initial expert disclosures fast approaching. Plaintiff's counsel provided  
2 the executed authorizations the afternoon of August 25, 2015.

3 (d) A proposed schedule for completing all remaining discovery:

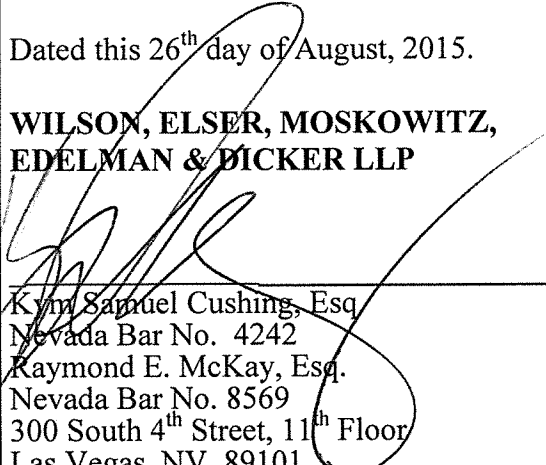
- 4 1. *Discovery Cut-off Date.* **December 9, 2015**  
5 2. *Amending the Pleadings and Adding Parties.* **September 11, 2015**  
6 3. *Fed. R. Civ. P. 26(a)(2) Disclosures (Experts).* **Initial Experts: October 12, 2015**  
7 4. *Rebuttal Experts:* **November 12, 2015**  
8 5. *Dispositive Motions.* **January 11, 2016**  
9 6. *Pretrial Order.* The joint pretrial order shall be filed not later than **February 8, 2016**  
10 7. *Fed. R. Civ. P. 26(a)(3) Disclosures.* The disclosures required by Fed. R. Civ. P.  
11 26(a)(3), and any objection(s) thereto, shall be included in the pretrial order.

12 **C. LR 26-7(B) Certification of Counsel**

13 On August 25, 2015, Raymond McKay, Esq., counsel for Defendant, communicated with  
14 David J. Martin, Esq., counsel for Plaintiff, regarding extending the discovery and pre-trial  
15 deadlines. Plaintiff's counsel agreed to extend the current discovery and pre-trial deadlines by  
16 approximately 30 days from the current deadlines.

17  
18 Dated this 26<sup>th</sup> day of August, 2015.

19 **WILSON, ELSER, MOSKOWITZ,**  
20 **EDELMAN & DICKER LLP**

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23 Kym Samuel Cushing, Esq.  
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24 Raymond E. McKay, Esq.  
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Las Vegas, NV 89101  
25 Attorneys for Defendant  
ALBERTSON'S LLC

Dated this 26<sup>th</sup> day of August, 2015.

21 **HENNESS & HAIGHT**

*/s/ David J. Martin*

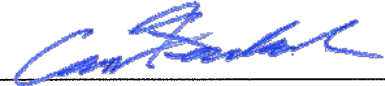
22 David J. Martin, Esq.  
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Las Vegas, NV 89148  
Attorneys for Plaintiff  
NAKIA BASKERVILLE

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**ORDER**

IT IS SO ORDERED.

DATED: this 26th day of August, 2015.



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UNITED STATES MAGISTRATE JUDGE