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1 CLARK COUNTY SCHOOL DISTRICT
  OFFICE OF THE GENERAL COUNSEL
  S. SCOTT GREENBERG, ESQ.
  Nevada Bar No. 4622
  5100 W. Sahara Ave.
  Las Vegas, Nevada 89146
  (702) 799-5373
  Attorneys for Defendant CCSD
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                     UNITED STATES DISTRICT COURT
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DISTRICT OF NEVADA

JILL LEFF, et al, 10

Plaintiff,

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CLARK COUNTY SCHOOL DISTRICT, a county school district,

Defendant.

CASE NO.: 2:15-cv-01155-RFB-GWF

STIPULATION AND ORDER TO CONDUCT DEPOSITIONS AFTER DISCOVERY **DEADLINE**

(First Request)

COME NOW the parties, by and through their counsel of record, and hereby stipulate and agree that the parties may take depositions of Plaintiffs not deposed during the discovery period for the purpose of damage issues up to sixty (60) days following a ruling on dispositive motions. This is the first request to allow depositions beyond the discovery deadline. This request is not intended for any reason of delay but to allow the litigation to proceed in a cost-effective manner consistent with Fed.R.Civ.P. 1 which provides the rules of civil procedure "should be construed, administered, and employed by the court and the parties to secure / / /

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1 the just, speedy, and inexpensive determination of every action and proceeding." The parties agree this stipulation will not be used as a defense or objection to injunctive relief Plaintiffs may seek nor is this stipulation a waiver of any applicable defense or objection should injunctive relief be entered by the court.

The discovery deadline is April 4, 2017. The dispositive motion deadline is May 4, 2017. The parties will be filing motions for summary judgment following the close of discovery. There are fifteen (15) individual Plaintiffs. While the legal issues are 10 common to the Plaintiffs, damage issues will be individualized to the various Plaintiffs. Damage issues will not be relevant to dispositive motions; therefore, the parties wish to have a ruling on dispositive motions before expending the time and expense on depositions for damage issues and which may be avoided depending on the Court's dispositive motions ruling. Therefore, the parties have agreed to conduct Plaintiffs' depositions, for Plaintiffs not already deposed, regarding damage issues only not later than sixty (60) days after a ruling on dispositive motions should any claims remain.

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| allowed to conduct depositions of Plaintiffs not already deposed as to damage issues only no later than sixty (60) days following a ruling on dispositive motions. Dated this 29th day of March, 2017. CLARK COUNTY SCHOOL DISTRICT Office of the General Counsel By: /s/ S. Scott Greenberg S. SCOTT GREENBERG Nevada Bar No. 4622 S100 W. Sahara Ave. Las Vegas, Nevada 89146 (702) 799-5373 Attorneys for Defendant CCSD TIT IS SO ORDERED: TIT IS SO ORDERED: Las Vegas, Nevada 89146 Attorneys for Plaintiffs CCSD | to damage issues only no later than sixty (60) days following ruling on dispositive motions. Dated this 29th day of March, 2017. CLARK COUNTY SCHOOL DISTRICT Office of the General Counsel By: /s/ S. Scott Greenberg S. SCOTT GREENBERG Nevada Bar No. 4622 5100 W. Sahara Ave. Las Vegas, Nevada 89146 (702) 799-5373 Attorneys for Defendant CCSD TI IS SO ORDERED: TI IS SO ORDERED: Dated: April 3, 2017 Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nevada Bar No. 5282 2805 Mountain Street Carson City, Nv 89703 (775) 885-1896 Attorneys for Plaintiffs Las Vegas, Nv 89703 (775) 885 | request that they be | | |
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