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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

11 ***

12 MANUEL RAMOS RODRIGUEZ,

13 Plaintiff,

14 vs.

15 LAS VEGAS METROPOLITIAN POLICE
 16 DEPARTMENT, ET AL. BECK, ALYN –
 LVMPD #7459; ESCARTIN, GARRETT –
 17 LVMPD # 9496; HOLLOWAY, K – LVMPD
 #10146; LAURENCO, ANTONIO –
 18 LVMPD#5198; RICH, BRIAN - LVMPD
 #14300; PORTER, H – LVMPD # 14086;
 19 THOMAS, RICHARD – LVMPD P# 9658;
 LOMBARCO, JOE – LVMPD – SHERIFF;
 20 MCMAHILL, KEVIN – LVMPD- UNDER
 SHERIFF, REYNOLDS, LVMPD-CCDC-
 21 SERGEANT, BROWDER, TIMOTHY –
 IMC- HOSPITAL PHYSICIAN; DR. DURAN
 22 –CCDC NAPHCARE – PHYSICIAN; DR.
 ZINSER – CCDC – NAPHCARE –
 23 PHYSICIAN, JOHN DOE – CCDC CHIEF
 MEDICAL ADMINISTRATOR;

24 Defendants.

CASE NO. 2:15-cv-1212-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(SECOND REQUEST)

26 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
 27 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
 28 ninety (90) days, up to and including Monday, April 9, 2018. In addition, the parties request that

1 the dispositive motions and pretrial order deadlines be extended for an additional ninety (90) days
2 as outlined herein. In support of this Stipulation and Request, the parties state as follows:

3 1. On May 23, 2017, Plaintiff filed his Second Amended Civil Rights Complaint in
4 the United States District Court, Clark County, Nevada.

5 2. On August 8, 2017, Defendants filed their Answer to Plaintiff's Second Amended
6 Civil Rights Complaint with Federal Court.

7 3. On November 13, 2017, Defendants served their Initial Disclosure of Documents
8 and Witnesses on Plaintiff.

9 4. On December 7, 2017, Defendants served written discovery on Plaintiff. Plaintiff's
10 responses are due on January 10, 2018.

11 **DISCOVERY REMAINING**

12 1. Defendants will take the deposition of Plaintiff in January or February 2018.

13 2. The parties will complete all written discovery.

14 3. Defendants will collect Plaintiff's medical and billing records related to medical
15 treatment following the incident, as well as medical records for medical treatment Plaintiff
16 underwent prior to the subject incident.

17 4. The parties will take the depositions of Plaintiff's medical providers once
18 Defendant is able to obtain the medical records.

19 5. The parties will take the depositions of any and all other witnesses garnered
20 through discovery.

21 This Request for an extension of time is not sought for any improper purpose or other
22 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
23 time to conduct discovery.

24 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

25 The parties have been compiling documents and investigating the instant action. The
26 parties are actively engaged in written discovery and will proceed with the necessary case
27 depositions.

28 Counsel for Defendants has been occupied in preparing Motions for Summary Judgment in

1 Donell Bryant v. Officer Donohue, et al., 2:16-cv-1172-GMN-PAL and Terry Hollis v. NLVPD,
 2 2:16-cv-2663-JAD-GWF. Counsel for Defendants has also been occupied preparing briefs after
 3 three labor arbitration hearings involving numerous law enforcement witnesses.

4 Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs
 5 modifications or extension of this discovery plan and scheduling order. Any stipulation or motion
 6 must be made no later than twenty-one (21) days before the expiration of the subject deadline, and
 7 comply fully with LR 26-4.

8 The following is a list of the current discovery deadlines and the parties' proposed
 9 extended deadlines.

10	Scheduled Event	Current Deadline	Proposed Deadline
11	Discovery Cut-off	Monday, February 12, 2018	Monday, May 14, 2018
12	Amendment to Pleadings	Thursday, January 11, 2018	Closed
13	Interim Status Report	Thursday, December 14, 201, or not later than sixty (60) days before discovery cutoff	Closed
14			
15	Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	Thursday, December 14, 2017, or at least sixty (60) days before discovery cutoff	Closed
16			
17	Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	Tuesday, January 16, 2018, or at least thirty (30) days after the initial date for disclosure of expert witnesses	Closed
18			
19	Dispositive Motions	Wednesday, March 14, 2018, or at least thirty (30) days after the close of discovery	Tuesday, June 12, 2018, or at least thirty (30) days after the close of discovery
20			
21	Joint Pretrial Order	Friday, April 13, 2018, or at least thirty (30) days after the decision of last Dispositive Motions	Thursday, July 12, 2018, or at least thirty (30) days after the decision of last Dispositive Motions
22			
23			

24 This Request for an extension of time is not sought for any improper purpose or other
 25 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
 26 time to conduct discovery in this case and adequately prepare their respective cases for trial.

27 This is the second request for extension of time in this matter. The parties respectfully
 28 submit that the reasons set forth above constitute compelling reasons and good cause for the short

1 extension.

2 WHEREFORE, the parties respectfully request that this Court extend the discovery period
3 by ninety days (90) days from the current deadline of February 12, 2018 up to and including
4 May 14, 2018 and the other discovery dates as outlined in accordance with the table above.

5 DATED this 11 day of January 2018.

DATED this 13 day of January, 2018.

6 LEWIS BRISBOIS BISGAARD & SMITH

Manuel Ramos-Rodriguez

7
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14 *Attorneys for Defendants*

Manuel Ramos-Rodriguez
aka Julio Estrada Lopez
#1212984
Clark County Detention Center
Las Vegas, Nevada 89101
Plaintiff in Proper Person

13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 22 day of January, 2018.

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18 UNITED STATES MAGISTRATE JUDGE
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