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 7 LONDON SUBSCRIBING TO POLICY NO. HAH15-0632

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

11 MY LEFT FOOT CHILDREN'S THERAPY,  
 12 LLC; JOHN GOTTLIEB AND ANN MARIE  
 GOTTLIEB,

13 Plaintiffs,

14 v.

15 CERTAIN UNDERWRITER'S AT LLOYD'S  
 16 LONDON SUBSCRIBING TO POLICY NO.  
 HAH15-0632,

17 Defendant.

Case No. 2:15-cv-01746-MMD-VCF

**JOINT MOTION TO CONTINUE HEARING  
 DATE TO DETERMINE IF DISCOVERY  
 SHOULD BE REOPENED  
 (FIRST REQUEST)**

19 The Parties hereby jointly stipulate, and respectfully request that this Court continue the  
 20 hearing date of December 18, 2019, currently set to determine if discovery should be reopened (ECF  
 21 No. 130). As grounds for this Motion the Parties state as follows:

23 1. Defendant has engaged new counsel, for whom petitions to appear *pro hac vice* are  
 24 being filed concurrently herewith.

25 2. In light of this development, Counsel for both parties have conferred and agree that it  
 26 would be best to postpone the hearing set for December 18, 2019 until a date convenient for the Court  
 27 in February.  
 28

1           3. Counsel for Plaintiffs and Barry Chasnoff, Defendant's new counsel, are well  
2 acquainted, and have agreed that it would make sense for Mr. Chasnoff to have time to familiarize  
3 himself with the file and then explore with Plaintiffs' counsel whether there is a resolution to this  
4 matter satisfactory to all parties. In the alternative, the postponement would allow time for Counsel to  
5 agree to an efficient discovery approach.  
6

7           4. Such an approach is in everyone's interest given that persons who may be deposed and  
8 may have relevant documents reside in England as well as this country.  
9

10           WHEREFORE the Parties request that the Court allow the instant Motion and continue the  
11 December 18<sup>th</sup> hearing.

12           **DATED** this 10<sup>th</sup> day of December, 2019.  
13

14           **CLARK HILL PLLC**

14           **AKIN GUMP STRAUSS HAUER & FELD LLP**

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25           Gottlieb, and Ann Marie Gottlieb  
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28

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14 *Attorneys pro hac vice (pending) for*

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17 *0632*

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17 Defendant.

Case No. 2:15-cv-01746-MMD-VCF

**[PROPOSED] ORDER GRANTING  
JOINT MOTION TO CONTINUE HEARING  
DATE TO DETERMINE IF DISCOVERY  
SHOULD BE REOPENED  
(FIRST REQUEST)**

18  
19 The Parties filed a Joint Motion to Continue Hearing Date to Determine if Discovery Should  
20 be Reopened ("Motion"). After reviewing the Motion, the Court is of the opinion that the Motion  
21 should be GRANTED. Accordingly,  
22

23 IT IS HEREBY ORDERED that the Motion is GRANTED and that the December 18<sup>th</sup> hearing  
24 to determine if discovery should be reopened (ECF No. 130) is continued to  
25 11:00 AM, February 10, 2020, in Courtroom 3D.  
26

27  
28 DATED this 13<sup>th</sup> day of December, 2019.

  
\_\_\_\_\_  
CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE