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*Attorneys for Defendant, Bellagio, LLC*

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

11 ANDI KRAJA, an individual;  
 12  
 13 Plaintiff,  
 14 vs.  
 15 BELLAGIO, LLC, a Nevada Corporation;  
 16 VINCENT ROTOLO, an individual; ROE  
 17 Business Organizations I-X; and DOE  
 18 INDIVIDUALS I-X, Inclusive,  
 19 Defendants.

Case No. 2:15-cv-01983-APG-NJK

**JOINT STATUS  
 REPORT/STIPULATION FOR  
 PROPOSED SCHEDULE**

**ORDER**

18 On September 26, 2019, this Court held a hearing on Defendant Bellagio, LLC’s  
 19 (“Bellagio”) Renewed Motion for Judgment as a Matter of Law; or in the Alternative, for a New  
 20 Trial (the “Motion”). At the hearing, based upon the Court’s review of the Motion, the Opposition  
 21 filed by Plaintiff, Andi Kraja (“Kraja”) and Bellagio’s Reply and following oral argument from the  
 22 parties, the Court ordered the parties to meet and confer regarding the scheduling of an evidentiary  
 23 hearing on Bellagio’s Motion, including a schedule for possible discovery prior to the same.  
 24 Following the hearing, the parties have met and conferred and hereby file the following Joint Status  
 25 Report/Proposed Schedule:

26 1. The parties shall be entitled to serve written discovery limited to the evidence  
 27 surrounding the iPhone used by Kraja to take the photograph introduced at trial as Trial Exhibit 1,  
 28 along with the availability of any potential iCloud or other electronic backups of said photograph

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1 (the "Photograph At Issue"). Any such written discovery shall be served by October 18, 2019.  
2 The parties reserve the right to seek additional written discovery, even after this deadline, should  
3 good cause exist for such additional discovery.

4 2. Kraja shall have until November 8, 2019 to retain and disclose an expert report  
5 regarding the Visual Evidence. Kraja reserves the right to seek additional time to retain and disclose  
6 an expert report, should the need for such an extension arise.

7 3. The parties shall have until December 20, 2019 to take the deposition of the opposing  
8 party's expert.

9 4. The evidentiary hearing shall be held on **January 3, 2020 at 1:00 p.m.** The  
10 evidentiary hearing shall be limited to four (4) hours.

11 DATED this 8th day of October, 2019.

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KEMP & KEMP

13  
14 By: /s/ Todd L. Bice  
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17 *Attorneys for Defendant, Bellagio LLC*

*Attorneys for Plaintiff, Andi Kraja*

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IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

Dated: October 9, 2019.

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