1 JAMES P. KEMP, ESQ. Nevada Bar No.: 6375 2 VICTORIA L. NEAL, ESQ. Nevada Bar No.: 13382 3 **KEMP & KEMP** 4 7435 W. Azure Drive, Ste 110 Las Vegas, NV 89130 5 702-258-1183 ph./702-258-6983 fax jp@kemp-attorneys.com 6 vneal@kemp-attorneys.com 7 Attorneys for Plaintiff 8 Andi Kraja 9 **UNITED STATES DISTRICT COURT** 10 **DISTRICT OF NEVADA** 11 \*\*\* 12 ANDI KRAJA Case No.: 2:15-cv-01983-APG-NJK 13 Plaintiff, 14 vs. STIPULATION TO EXTEND TIME 15 FOR PLAINTIFF TO OBTAIN AN **EXPERT AND SUBMIT AN EXPERT** BELLAGIO, LLC, a Nevada Corporation; 16 **REPORT AND ORDER** VINCENT DEFENDANT ROTOLO, an 17 Individual. (FIRST REQUEST) Defendants. 18 Hearing Date: January 3, 2020 19

20 On September 26, 2019, the Court ordered the parties meet and confer regarding the 21 scheduling of an evidentiary hearing, including a schedule for possible discovery. The parties met 22 and conferred and on October 8, 2019, submitted a Joint Status Report/Stipulation For Proposed 23 Schedule which was approved by the Court on October 9, 2019. ECF No. 232. The Stipulation 24 reads in part "Kraja shall have until November 8, 2019 to retain and disclose an expert report 25 26 regarding the Visual Evidence. Kraja reserves the right to seek additional time to retain and disclose 27 an expert report, should the need for such an extension arise." **Id. at 2:4-6**. An expert (out of area) 28

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1 has been located and a meeting scheduled for November 11, 2019. It is unknown at this time how 2 long it will take for the expert to draft a report. The parties stipulate that Plaintiff may have up to and 3 including November 21, 2019 in which to submit an expert report, but may request additional time 4 should the need for such an extension arise. 5 Dated this 6th day of November, 2019. 6 7 **KEMP & KEMP** PISANELLI BICE PLLC 8 By: /s/ Victoria L. Neal, Esq. By: /s/ Robert A. Ryan, Esq. 9 Todd L. Bice, Esq., Bar No. 4534 James P. Kemp, Esq., Bar No. 6375 Victoria L. Neal, Esq., Bar No. 13382 Robert A. Ryan, Esq., Bar No. 12084 10 7435 W. Azure Drive, Suite 110 400 South 7th Street, Suite 300 11 Las Vegas, Nevada 89130 Las Vegas, Nevada 89101 12 Attorneys for Plaintiff, Andi Kraja Attorneys for Defendant, Bellagio LLC 13 14 **IT IS SO ORDERED:** 15 16 17 UNITED STATES DISTRICT JUDGE 18 Dated: November 6, 2019. 19 20 21 22 23 24 25 26 27 28

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