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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

COLIN BARCELOUX, a California Citizen,

Plaintiff,

VS.

THE LIGHT GROUP, LLC, a Nevada Corporation; LIBBEY GLASS, INC.; and DOES 1-100, ROE Corporations I-X, inclusive.

Defendants.

CASE NO: 2:15-cv-02448-JAD-NJK

STIPULATION AND ORDER TO HOLD EXPERT DEADLINES IN ABEYANCE

SECOND REQUEST

(Under Scheduling Order entered January 6, 2017, Dkt. # 76)

IT IS HEREBY STIPULATED, by and between:

Plaintiff: COLIN BARCELOUX, through his counsel of record, Ryan Hamilton, Esq. of HAMILTON LAW, and

Defendant: LIBBEY GLASS, INC., through its counsel of record, Brian K. Terry, Esq. of THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER,

1. Discovery Completed to Date:

- A. Parties have propounded lengthy written discovery and parties have answered;
- B. The parties have disclosed numerous records and evidence;
- C. Deposition of Plaintiff (by Defendant The Light Group, LLC);
- D. Parties have briefed a summary judgment motion;

2. Discovery that Remains to be Completed

- 1 A. Depositions of the Defendant's representatives;
- 2 B. Discovery of third-party distributor;
- 3 C. Deposition of third-party witnesses;
- 4 D. Disclosure of experts;
- 5 E. Depositions of the parties' experts (to be disclosed);
- 6 F. Additional written and deposition discovery as determined by the parties;

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8 **3. Why Discovery Was Not Completed Within the Limits Set by the**
Discovery Order

9 Plaintiff has moved to join third-party glassware distributor A&H Supply, Inc. as a defendant.

10 Defendant Libbey Glass, Inc. has opposed Plaintiff's motion. The Court has set hearing on the

11 motion for June 5, 2017. If the Court grants Plaintiff's motion it is likely that a new scheduling

12 order will need to be entered in the case. The parties seek to hold the expert disclosure deadlines in

13 abeyance until the Court has ruled on Plaintiff's motion.

14 **4. Proposed Schedule for Completing Discovery**

15 The current deadlines are as follows:

16	Last day to serve initial disclosures	Closed
17	Last day to file a motion to add parties Or amend pleadings	Closed
18	Initial expert disclosure deadline:	May 29, 2017
19	Interim Status Report	May 29, 2017
20	Rebuttal expert disclosure deadline:	June 28, 2017
21	Discovery cut off:	July 28, 2017
22	Last day to file dispositive motions	August 28, 2017
23	Joint Pretrial Order	September 28, 2017

25 The proposed schedule for completing the remaining discovery is as follows:

1	Last day to serve initial disclosures	Closed
2	Last day to file a motion to add parties Or amend pleadings	Closed
3	Initial expert disclosure deadline:	abeyance
4	Interim Status Report	May 29, 2017
5	Rebuttal expert disclosure deadline:	abeyance
6	Discovery cut off:	July 28, 2017
7	Last day to file dispositive motions	August 28, 2017
8	Joint Pretrial Order	September 28, 2017

10 5. Certificate of Conference and Stipulation

11 Counsel for the parties have conferred by email and telephone and have signed below,
 12 indicating their agreement to this Stipulation and Order to Hold the Expert Deadlines in Abeyance
 13 (Second Request).

14 The parties do not request a conference with the Magistrate before entry of an Amended
 15 Scheduling Order, should one be required.

16 DATED this 8th day of May, 2017.

17 By: /s/Ryan A. Hamilton
 18 HAMILTON LAW
 19 5125 S. Durango, Suite C
 Las Vegas, NV 89113

20 By: /s/Brian K. Terry
 Brian K. Terry, Esq.
 21 THORNDAL, ARMSTRONG, DELK, BALKENBUSH & EISINGER
 1100 E. Bridger Avenue
 22 Las Vegas, NV 89101-5315

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The stipulation is **GRANTED** in part and **DENIED** in part, and the deadlines are set as follows:

Last day to serve initial disclosures	Closed
Last day to file a motion to add parties Or amend pleadings	Closed
Initial expert disclosure deadline:	abeyance June 19, 2017
Interim Status Report	May 29, 2017
Rebuttal expert disclosure deadline:	abeyance July 7, 2017
Discovery cut off:	July 28, 2017
Last day to file dispositive motions	August 28, 2017
Joint Pretrial Order	September 28, 2017

DATED May 9, 2017.

United States Magistrate Judge