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8	UNITED STATE	S DISTRICT COURT
9	DISTRIC	Г OF NEVADA
10		
11	JOHN and JANE DOE I, Guardians Ad Litem for JOANN DOE I, a minor, individually and	Case No. 2:16-cv-00239-APG-PAL
12	on behalf of all those similarly situated, and JOHN and JANE DOE II, Guardians Ad Litem	
13	for JOANN DOE II, a minor, individually and on behalf of all those similarly situated;	
14 15	Plaintiffs, vs.	[PROPOSED] STIPULATION AND ORDER TO EXTEND STAY OF CASE
16	VS. JEREMIAH MAZO; CLARK COUNTY	FOR 60 DAYS
17	SCHOOL DISTRICT; DOES 1 through 20; DOE 1 through 20; ROE CORPORATIONS 1 through 20;	
18	Defendants.	
19		
20		
21	WHEREAS on June 13, 2018 this Cour	rt entered an order after receiving a stipulation from
22	the parties extending the discovery deadlines	s and staying this matter for 60 days to facilitate
23	settlement discussions (Doc. #88);	
24	WHEREAS the parties are continuing	to negotiate a settlement in good have and have
25	agreed to delay the taking of the limited re	maining depositions in this case to help facilitate
26	settlement discussions and reserve resources;	
27		
28		- 1 -
		Dockets.Justia.co

THEREFORE, in light of this agreement, Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD"), by and through their respective counsel of record, hereby jointly submit this proposed stipulation extending certain case deadlines for the approval of the Court.

STIPULATION

Pursuant to Local Rule 6.1, the Parties hereby stipulate and agree that the case be stayed for an additional period of 30 days and the current discovery deadlines adjusted accordingly. The current deadlines are as follows:

Discovery Cut-Off Date:	August 29, 2018
Dispositive Motions:	September 28, 2018
Proposed Joint Pretrial Order:	October 29, 2018 or 30 days after the Court rules on any dispositive motions.

I. Background

This case was filed on February 5, 2016, alleging abuse of students by a former CCSD teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

II. Discovery Completed

Plaintiffs have served Defendant Clark County School District with the following discovery to date:

- 2 -

1.

- Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to

1		FRCP 26(F) served 10/10/2016;
2	2.	Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
3		Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of
4		Production of Documents served 10/27/16;
5	3.	Plaintiffs' First Supplement to Early Case Conference List of Documents and
6		Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
7	4.	Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
8		County School District's First set of Interrogatories served 12/14/2016;
9	5.	Plaintiff Joann Doe I's Responses to Clark County School District's First set of
10		Interrogatories served 12/14/2016;
11	6.	Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
12		County School District's First set of Interrogatories served 12/14/2016;
13	7.	Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to
14		Clark County School District's First set of Request for Production of Documents
15		served 12/14/2016;
16	8.	Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
17		County School District's First set of Interrogatories served 12/14/2016;
18	9.	Plaintiff Joann Doe II's Responses to Clark County School District's First set of
19		Interrogatories served 12/14/2016;
20	10.	Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
21		County School District's First set of Interrogatories served 12/14/2016;
22	11.	Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses
23		to Clark County School District's First set of Request for Production of Documents
24		served 12/14/2016;
25	12.	Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
26		Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for
27		Production of Documents served 01/18/2017;
28		- 3 -

1	13.	Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
2		Requests for Admission served 01/18/2017;
3	14.	Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
4		Interrogatories served 01/18/2017;
5	15.	Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
6		Interrogatories served 01/18/2017;
7	16.	Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
8		Requests for Admission served 01/18/2017;
9	17.	Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
10		Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for
11		Production of Documents served 01/20/2017;
12	18.	Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of
13		Interrogatories served 01/23/2017;
14	19.	Plaintiffs' Second Supplement to Early Case Conference List of Documents and
15		Witnesses Pursuant to FRCP 26(F) served 02/10/17;
16	20.	Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of
17		Interrogatories served on 03/01/17;
18	21.	Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of
19		Interrogatories served on 03/01/17;
20	22.	Plaintiffs' Third Supplement to Early Case Conference List of Documents and
21		Witnesses Pursuant to FRCP 26(F) served 05/31/17;
22	23.	Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and
23		Witnesses Pursuant to FRCP 26(F) served 07/07/17;
24	24.	Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of
25		Interrogatories to CCSD served 07/11/17;
26	25.	Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of
27		Interrogatories to CCSD served 08/22/17;
28		- 4 -

1	26.	Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and
2		Witnesses Pursuant to FRCP 26(F) served 10/11/17;
3	27.	Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.
4	Defen	ndant Clark County School District has served Plaintiffs with the following
5	discovery to	date:
6	1.	CCSD's Initial Disclosures served 10/05/2016;
7	2.	CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for
8		Joann Doe I served 11/14/2016;
9	3.	CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
10	4.	CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for
11		Joann Doe I served 11/14/2016;
12	5.	CCSD's First set of Requests for Production of Documents to Plaintiffs John and
13		Jane Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;
14	6.	CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for
15		Joann Doe II served 11/14/2016;
16	7.	CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
17	8.	CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for
18		Joann Doe II served 11/14/2016;
19	9.	CCSD's First set of Requests for Production of Documents to Plaintiffs John and
20		Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
21	10.	CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents
22		to the Clark County School District served 12/01/2016;
23	11.	CCSD's First Supplemental Disclosures served 12/01/2016;
24	12.	CCSD's Second Supplemental Disclosures served 02/17/17;
25	13.	CCSD's Third Supplemental Disclosures served 02/24/17;
26	14.	CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
27		Minor's First Set of Requests for Admission to CCSD served 02/24/17;
28		- 5 -

1	15.	CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
2		Minor's First Set of Requests for Admission to CCSD served 02/24/17;
3	16.	CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
4		Minor's First set of Interrogatories to CCSD served 02/27/17;
5	17.	CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
6		Minor's First set of Interrogatories to CCSD served 02/27/17;
7	18.	CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
8		Minor's Second set of Interrogatories to CCSD served 03/10/17;
9	19.	CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant
10		to March 6, 2017 Order served 04/05/17;
11	20.	CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
12		Minor's Third set of Interrogatories to CCSD served 07/24/17;
13	21.	CCSD's Fourth Supplemental Disclosures served 08/21/17;
14	22.	CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
15		Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
16	23.	CCSD's Sixth Supplemental Disclosures served 09/01/2017;
17	24.	CCSD's Seventh Supplemental Disclosures served 10/13/17;
18	25.	CCSD's Expert Witness Disclosures served 10/13/17.
19	The followin	g depositions have been completed to date:
20	1.	Ulandra Barnett
21	2.	Ivy Burns
22	3.	Sylvia Glass
23	4.	Jennifer Mattiello
24	5.	Nestor Mattiello
25	6.	Jon Okazaki
26	7.	Julia Pettit
27	8.	Kristopher Pettit
28		- 6 -

1	9.	Christine Prosen	
2	10.	Darrin Puana	
3	11.	Billie Rayford	
4	12.	Joann Lippert	
5	III.	Discovery That Remains to be Completed	
6	1.	Depositions of Plaintiffs Joann Doe I and Joann	n Doe II; ¹ and
7	2.	Certain Expert Depositions ²	
8	IV.	Basis for Extension	
9	The p	parties are continuing to negotiate a settlement i	n good faith and request this stay and
10	extension of	discovery to allow the depositions of Joann Doe	I, Joann Doe II (subject to Motion for
11	Protective C	Order), and certain of the parties' expert witne	sses to take place should settlement
12	negotiations	come to an impasse. The parties have diligent	ly engaged in discovery and want to
13	avoid incurring any additional expense at this time. Accordingly, the parties request an additional		
14	60 day stay of this matter and request an extension to allow for the foregoing outstanding discovery		
15	to be completed 60 days from the current deadlines as detailed below.		
16	V.	Proposed Modification	
17	Based	d on the foregoing, the parties jointly seek a mo	odification of the current deadlines as
18	follows:		
19	1.	<u>Current Deadlines</u> :	A
20		Discovery Cut-Off Date:	August 29, 2018
21		Dispositive Motions:	September 28, 2018
22		Proposed Joint Pretrial Order:	October 29, 2018 or 30 days after the Court rules on any dispecitive motions
23			dispositive motions.
24			
25			
26		r such deposition to go forward is the subject of Plaintiff's lave taken the deposition of Plaintiffs' expert Joann Lippert.	
27	experts Terrence	ce Clauretie, Edward Dragan, Peter Loehr and Brett Sokolo lepositions to allow for settlement discussions.	
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1	2. <u>Proposed Deadlines</u> :	
2	Discovery Cut-Off Date: October 29, 2018	
3	Dispositive Motions: November 28, 2018	
4	Proposed Joint Pretrial Order: December 28, 2018 or 30 days	
5	after the Court rules on any dispositive motions.	
6	3. This request is made in good faith and not for the purposes of delay.	
7	IT IS SO STIPULATED.	
8		
9	Dated this 7th day of August, 2018.Dated this 7th day of August, 2018.	
10	GREENBERG TRAURIG, LLP EGLET PRINCE	
11	/s/ Kara B. Hendricks /s/ Artemus W. Ham	
12	MARK E. FERRARIO, ESQ. (NV BAR 1625)ROBERT T. EGLET, ESQ. (NV BAR 3402)KARA B. HENDRICKS, ESQ. (NV BAR 7743)ARTEMUS W. HAM, ESQ. (NV BAR 7001)	
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14	Las Vegas, Nevada 89169 Las Vegas, Nevada 89101	
15	Attorneys for Defendant Clark County School District Attorneys for Plaintiffs	
16	-and-	
17	HALL JAFFE & CLAYTON, LLP STEVEN T. JAFFE, ESQ. (NV BAR 7035) 7425 Peak Drive Las Vegas, Nevada 89128 Attorneys for Defendant Clark County	
18		
19		
20	School District	
21	ORDER IT IS HEREBY ORDERED.	
22	IT IS FURTHER ORDERED that no further extensions will be allowed.	
23		
24	IT IS FURTHER ORDERED that the hearing on the Motion for Protective Order (ECF No. 78)	
25	is set for <u>9:30 a.m., September 25, 2018</u> .	
26	DATED this 23rd day of August, 2018.	
27	Juggy a. Seen	
27	UNITED STATES MAGISTRATE JUDGE - 8 -	
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