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 8 *Clark County School District*

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

11 JOHN and JANE DOE I, Guardians Ad Litem
 for JOANN DOE I, a minor, individually and
 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;

Case No. 2:16-cv-00239-APG-PAL

14 Plaintiffs,

15 vs.

**[PROPOSED] STIPULATION AND
 ORDER TO EXTEND STAY OF CASE
 FOR 60 DAYS**

16 JEREMIAH MAZO; CLARK COUNTY
 SCHOOL DISTRICT; DOES 1 through 20;
 17 DOE 1 through 20; ROE CORPORATIONS 1
 through 20;

18 Defendants.
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 21 WHEREAS on June 13, 2018 this Court entered an order after receiving a stipulation from
 22 the parties extending the discovery deadlines 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 remaining depositions in this case to help facilitate
 26 settlement discussions and reserve resources;

- 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;

- 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;

- 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 following 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

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 Doe II;¹ and

7 2. Certain Expert Depositions²

8 **IV. Basis for Extension**

9 The parties are continuing to negotiate a settlement in 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 Order), and certain of the parties' expert witnesses to take place should settlement
12 negotiations come to an impasse. The parties have diligently 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 on the foregoing, the parties jointly seek a modification of the current deadlines as
18 follows:

- 19 1. **Current Deadlines:**
- | | |
|---------------------------------------|----------------------------------------------------------------------------------------------|
| 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. |
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26 ¹ The ability for such deposition to go forward is the subject of Plaintiff's Motion for Protective Order (Doc. No. 78).
27 ² Defendants have taken the deposition of Plaintiffs' expert Joann Lippert. The parties scheduled the depositions of
28 experts Terrence Clauretje, Edward Dragan, Peter Loehr and Brett Sokolow for the latter part of June, but agree to
continue such depositions to allow for settlement discussions.

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2. Proposed Deadlines:

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

3. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 7th day of August, 2018.

Dated this 7th day of August, 2018.

GREENBERG TRAUIG, LLP

EGLET PRINCE

/s/ Kara B. Hendricks

/s/ Artemus W. Ham

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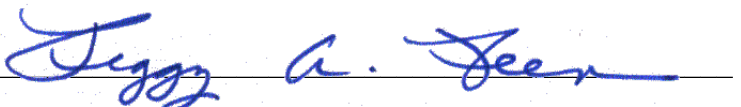
ORDER

IT IS HEREBY ORDERED.

IT IS FURTHER ORDERED that no further extensions will be allowed.

IT IS FURTHER ORDERED that the hearing on the Motion for Protective Order (ECF No. 78) is set for 9:30 a.m., September 25, 2018.

DATED this 23rd day of August, 2018.


UNITED STATES MAGISTRATE JUDGE