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7 *Attorneys for Defendants Nevada State*
 8 *Education Association and Education*
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10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 SAMANTHA A. GALING,
 an individual;

13 Plaintiff,

14 v.

15 NEVADA STATE EDUCATION
 ASSOCIATION a Domestic Non-
 16 Profit Coop. Corporation; EDUCATION
 SUPPORT EMPLOYEES ASSOCIATION
 17 a Domestic Non-Profit Coop. Corporation;
 DOES 1 through X, inclusive; ROE
 18 CORPORATIONS I through X, inclusive;

19 Defendants.

)
)
) Case No.: 2:16-CV-00993-APG-PAL

) **STIPULATION AND ORDER TO**
) **EXTEND DISCOVERY AND DISPOSITIVE**
) **MOTION DEADLINES**

) **(FIRST REQUEST)**

20 _____
 21 Pursuant to LR 6-1, 6-2 and 26-4 and for the reasons provided below, the parties, through
 22 their respective counsel request that the Court extend the discovery and dispositive motion deadlines
 23 in this matter for the limited purpose of allowing Plaintiff to take the depositions of Brian
 24 Christensen and Gary Peck. This is the first request for an extension of the discovery and dispositive
 25 motion deadlines.

26 **1. Discovery Completed to Date:**

- 27 A. The parties have disclosed numerous records and evidence;
- 28 B. The parties have propounded and answered interrogatories; requests for admission;
 and requests for production;

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- 1 C. Defendants have taken the deposition of Plaintiff;
- 2 D. The parties have produced numerous FRCP 26 disclosures.

3 **2. Discovery that Remains to be Completed:**

- 4 A. Plaintiff seeks to take the depositions of Brian Christensen and Gary Peck. Plaintiff
5 anticipates taking the aforementioned depositions by March 24, 2017.

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

7 On January 3, 2017, Plaintiff noticed the depositions of Brian Christensen and Gary Peck,
8 both former employees of Defendant NSEA, for January 19, 2017. Mr. Peck was not available on
9 January 19, 2017, and the parties agreed that Mr. Peck's deposition would be rescheduled for a more
10 convenient time after the close of discovery on January 23, 2017.

11 With regards to Mr. Christensen, Defendants were unable to provide Plaintiff with current
12 contact information for Mr. Christensen until January 10, 2017. Given that Defendants had been
13 unable to provide current contact information for Mr. Christensen until January 10, 2017, Defendants
14 agreed to give Plaintiff additional time after the close of discovery in order to subpoena Mr.
15 Christensen.

16 **4. Proposed Schedule for Completing Discovery and Filing Dispositive Motions**

17 On October 31, 2016, this Court ordered that the last date to complete discovery would be
18 January 23, 2017, and that the last day to file dispositive motions would be February 22, 2017. The
19 proposed schedule for completing the remaining discovery and to file dispositive motions is as
20 follows:

21 Last day to complete depositions mentioned herein: March 24, 2017

22 Last day to file dispositive motions: April 23, 2017

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5. Certificate of Conference and Stipulation

Counsel for the parties have conferred and have signed below, indicating their agreement to this Stipulation and Order to Extend Discovery Deadlines (First Request). The parties do not request a conference with the Magistrate before entry of an Amended Scheduling Order, should one be required.

Dated this 13th day of February, 2017

Dated this 13th day of February, 2017.

/s/Trevor J. Hatfield
TREVOR J. HATFIELD, ESQ
HATFIELD & ASSOCIATES
Attorneys for Plaintiff

/s/Casey A. Gillham
CASEY A. GILLHAM, ESQ.
DYER, LAWRENCE, FLAHERTY,
DONALDSON & PRUNTY
Attorneys for Defendants

ORDER

IT IS HEREBY ORDERED, ADJUDGED and DECREED that the deadlines in this case are as follows:

Plaintiff will have until March 24, 2017, to take the depositions of Brian Christensen and Gary Peck; and

The last day to file dispositive motions will be April 23, 2017.


UNITED STATES MAGISTRATE JUDGE

DATED: February 22, 2017

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