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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 MARIA C. VAN ZANDT,  
14  
15 Plaintiff,

16 v.

17 QUANTUM COLLECTIONS, INC.;  
18 BARCLAYS BANK, DELAWARE; FORD  
19 MOTOR CREDIT-OMAHA SERVICE  
20 CENTER; FORD MOTOR CREDIT  
COMPANY; EQUIFAX INFORMATION  
21 SERVICES, LLC; EXPERIAN  
INFORMATION SOLUTIONS, INC.,  
22  
23 Defendants.

Case No. 2:16-cv-01116-APG-NJK

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES (FIRST  
REQUEST)**

Complaint filed: May 18, 2016

24 IT IS HEREBY STIPULATED by and between Plaintiff Maria Van Zandt (“Plaintiff”)  
25 and Defendant Experian Information Solutions, Inc. (“Experian”), through their respective  
attorneys of record, as follows:

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1 **STIPULATION**

2 Pursuant to Local Rules 26-4 and IA 6-1, the parties hereby submit the following  
3 Stipulation and Order to Extend Discovery Deadlines (First Request) to extend certain discovery  
4 deadlines in this case by approximately fifty-nine (59) days.

5 **I. REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

6 Pursuant to Local Rule IA 6-1, the parties submit that good cause exists for the 59-day  
7 extension requested below for the following reasons:

8 The parties move for an extension of the discovery deadlines to conduct previously  
9 scheduled depositions based on Experian's unavailability. During the course of discovery,  
10 Plaintiff originally noticed a 30(b)(6) deposition of Experian on October 14, 2016 for November  
11 1, 2016. Experian has not served a formal objection to the notice, but informed Plaintiff that  
12 Experian did not have any witnesses available on that date. Following a lengthy meet and confer  
13 process, the parties contacted the Court pursuant to LR 1-1(b).<sup>1</sup> The Court required the parties  
14 submit a joint submission of their positions regarding the discovery dispute. On November 4,  
15 2016, following the filing of this joint submission, the Court vacated the LR 1-1(b) conference  
16 and directed the parties to meet and confer to determine new deposition dates and, where  
17 necessary, stipulate to the reasonable extension of discovery.<sup>2</sup> The parties have now mutually  
18 agreed to January 10, 2017, as the date for Experian's 30(b)(6) witnesses. Accordingly, the  
19 parties seek an extension of the discovery period to allow that deposition to go forward. The  
20 parties have further stipulated that the scope of discovery be limited to: (1) depositions of parties;  
21 (2) discovery motion practice related to those depositions; and (3) depositions of any witnesses  
22 included in a supplemental disclosure that are not presently listed on Plaintiffs' disclosures or  
23 supplements. This request is not made for purposes of delay, but merely to allow sufficient time  
24 to complete discovery in this case.

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27 <sup>1</sup> This case was one of several with similar scheduling conflicts that were presented to the Court.

28 <sup>2</sup> See 2:16-cv-01008-GMN-NJK, ECF No. 32.

1     **II.     DISCOVERY COMPLETED TO DATE**

- 2             • Plaintiff served Interrogatories, Request for Admissions and Requests for Production
- 3             of Documents upon Experian on June 16, 2016;
- 4             • Parties conducted Rule 26 conference on June 17, 2016;
- 5             • Experian served their initial disclosures on July 8, 2016;
- 6             • Experian responded to Interrogatories, Request for Admissions and Requests for
- 7             Production of Documents served by Plaintiff on September 7, 2016;
- 8             • Experian served its confidential supplemental responses to Plaintiff's first set of
- 9             requests for production on September 30, 2016.
- 10            • Plaintiff served First Supplemental Request for Production of Documents upon
- 11            Experian on October 24, 2016;
- 12            • Experian served Requests for Admission upon Plaintiff on November 3, 2016;
- 13            • Experian served Requests for Production of Documents upon Plaintiff on November 3,
- 14            2016;
- 15            • Experian served Interrogatories upon Plaintiff on November 3, 2016;

16     **III.     DISCOVERY TO BE COMPLETED**

- 17            • Deposition of Experian, pursuant to FRCP 30(b)(6), set for January 10, 2017;
- 18            • Deposition of Plaintiff;
- 19            • Experian's responses to Plaintiff's First Supplemental Request for Production of
- 20            Documents due November 28, 2016;
- 21            • Plaintiff's responses to Experian's Requests for Admission due on December 6, 2016;
- 22            • Plaintiff's responses to Experian's Request for Production due on December 6, 2016;
- 23            and
- 24            • Plaintiff's responses to Experian's Interrogatories due on December 6, 2016.

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1 **IV. PROPOSED NEW DISCOVERY DEADLINES**

2 <b>Discovery Deadline</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
3 <b>Discovery Cut-Off (as limited above)</b>	12/12/2016	<b>2/9/2017</b>
4 <b>Amend the Pleadings and Add Parties</b>	9/12/2016	No Change
5 <b>Experts Disclosures</b>	10/12/2016	No Change
6 <b>Rebuttal Expert Disclosures</b>	11/11/2016	No Change
7 <b>Interim Status Report</b>	10/4/2016	No Change
8 <b>Dispositive Motions</b>	1/10/2017	<b>3/13/2017</b>
9 <b>Pretrial Order</b>	2/9/2017	<b>4/12/2017</b>

11 The parties stipulate that the pre-trial order deadline will be suspended if dispositive  
 12 motions are timely filed until 30 days after the decision of the dispositive motions or until further  
 13 order of the Court. The disclosure required by FRCP 26(a)(3) and objections thereto shall be  
 14 made in the pre-trial order.

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**V. CONCLUSION**

Based upon the reasons set forth herein, the parties respectfully request that this Court grant their request to extend time to complete discovery.

**IT IS SO STIPULATED.**

DATED: November 18, 2016

DATED: November 18, 2016

KNEPPER & CLARK LLC

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*Attorneys for Defendant Experian  
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*Attorneys for Plaintiff Maria R. Van Zandt*

**ORDER**

**IT IS SO ORDERED.**

  
United States Magistrate Judge

DATED November 21 \_\_\_\_\_ 2016.