

1 **GEORGE M. RANALLI, ESQ.**
 Nevada Bar No. 5748
 2 **BENJAMIN J. CARMAN, ESQ.**
 Nevada Bar No. 12565
 3 **RANALLI ZANIEL FOWLER & MORAN, LLC**
 2400 W. Horizon Ridge Parkway
 4 Telephone: (702) 477-7774
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 5 ranalliservice@ranallilawyers.com
 Attorneys for Defendant
 6 CSAA General Insurance Company

7
 8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9
 10 **MARJORIE BISBEE**

2:16-cv-01500-JAD-PAL

11 Plaintiff,

12 v.

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY DEADLINES
 (First Request)**

13 **CSAA GENERAL INSURANCE COMPANY;
 DOES I through X; and ROE
 14 CORPORATIONS I through X,
 inclusive**

15 Defendant
 16

17 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, MARJORIE
 18 BISBEE, and Defendant, CSAA GENERAL INSURANCE COMPANY to Extend
 19 Discovery Deadlines by 60 days.

20 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

21 The following discovery has been completed by the parties:
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RANALLI ZANIEL FOWLER & MORAN, LLC
 2400 W. HORIZON RIDGE PARKWAY
 HENDERSON, NEVADA 89052
 TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

- 1 1. Defendant's Initial Disclosure, pursuant to FRCP
- 2 26(f);
- 3 2. Plaintiff's Initial Disclosure, pursuant to FRCP
- 4 26(f);
- 5 3. Defendant's First Set of Requests for Admissions to
- 6 Plaintiff;
- 7 4. Defendant's First Set of Interrogatories to Plaintiff;
- 8 5. Defendant's First Set of Request for Production of
- 9 Documents to Plaintiff;

10 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**
11 **COMPLETED:**

- 12 1. Depositions of the Person Most Knowledgeable from
- 13 Plaintiff's medical providers relevant to treatment
- 14 rendered to Plaintiff since the date of this accident;
- 15 2. Depositions of Plaintiff's claim handling expert who
- 16 is located out of state;
- 17 3. Deposition of Plaintiff;
- 18 4. Deposition of Defense Experts.

19 **A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED**
20 **WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

21 The parties anticipate taking the depositions of the
22 plaintiff, representatives from CSAA General and experts on the
23 first available dates. Defense counsel is about to begin a two
24 to three week trial, starting May 3, 2017 and will be

1 unavailable to schedule or coordinate the depositions.
2 Plaintiff's counsel has a trial beginning at the end of May that
3 is expected to last approximately four weeks.

4 The parties are not requesting to reopen the expert
5 deadlines, but instead request only a deadline to conduct
6 additional discovery. The parties believe that a modest
7 addition of sixty days will accommodate both parties
8 sufficiently to conclude the discovery that remains in this
9 matter.

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11 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

| | Old Deadline | New Deadline |
|----|---------------------|---------------------|
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1 F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

3 DATED this 26th day of April, 2017.

4 RANALLI ZANIEL FOWLER & MORAN, SEEGMILLER & ASSOCIATES
5 LLC


6 /s/ Benjamin J. Carman
7 _____
8 GEORGE M. RANALLI, ESQ.
9 Nevada Bar No. 5748
10 BENJAMIN J. CARMAN, ESQ.
11 Nevada Bar No. 12565
12 2400 W. Horizon Ridge Parkway
13 Henderson, Nevada 89052
14 Attorneys for Defendant

6 /s/ Clark Seegmiller
7 _____
8 CLARK SEEGMILLER, ESQ.
9 Nevada Bar No. 3873
10 10655 Park Run Drive, Suite
11 250
12 Las Vegas, NV 89144
13 Attorney for Plaintiff,
14 Marjorie Bisbee

15 **ORDER**

16 IT IS SO ORDERED:

17 Dated: April 28, 2017

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19 _____
20 UNITED STATES DISTRICT COURT
21 MAGISTRATE JUDGE
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