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11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 * * * *

14 **STACEY M. RICHARDS,**)
 15)
 16 **Plaintiff,**)
 17) **CASE NO. 2:16-CV-1794-JCM-PAL**
 18 **v.**)
 19)
 20 **GREG COX, et al.**)
 21)
 22 **Defendants.**)
 23 _____)

24 **STIPULATION AND REQUEST TO EXTEND DISCOVERY**
 25 **AND OTHER DEADLINES**
 26 **(2ND REQUEST)**

27 **IT IS HEREBY STIPULATED** by and between Plaintiff, **STACEY M. RICHARDS,**
 28 by his counsel Richard A. Schonfeld, Esq., of the law offices of Chesnoff & Schonfeld, and John
 Burton, Esq., of the law offices of John Burton, and Clark G. Leslie, Chief Attorney General,
 counsel for Defendants, Greg Cox, et al, pursuant to FRCP 26(f) and Local Rule 26-1(e), that the
 discovery deadline dates and trial of this matter, shall be extended by at least ninety days with the

1 close of Discovery being **January 9, 2018**, subject to this Court's approval:

2 The Parties seek to modify the Scheduling Order to extend the discovery cut-off date and
3 the motion cut-off date. This is necessary in order to effectively proceed with discovery herein.
4

5 1. Plaintiff's Complaint was filed on July 28, 2016;

6 2. Defendants Eric Boardman, Michael Byrne and William Gittere's Answer was filed
7 on September 29, 2016;

8 3. Defendant Michael Fletcher's Answer to Complaint was filed on October 14, 2016;

9 4. Defendants Renee Baker and Greg Cox's Answer to Complaint was filed on
10 November 1, 2016;

11 5. Counsel conducted the required case conference on October 5, 2016. Plaintiff was
12 represented by Richard A. Schonfeld of Chesnoff and Schonfeld and John Burton of the law
13 offices of John Burton. Defendants were represented by Clark G. Leslie, Chief Attorney General;
14

15 6. On November 9, 2016, this Honorable Court entered an Order setting discovery
16 deadlines;
17

18 7. On February 8, 2017, Plaintiff Initial Disclosures were electronically served on
19 Defendant;

20 8. On February 21, 2017, Plaintiff received Defendant's Initial Disclosures;

21 9. Plaintiff served Requests for Production of Documents, First Set of Interrogatories
22 and Request for Admissions to Defendants and Mr. Leslie served Defendant's Requests for
23 Production of Documents and First Set of Interrogatories and Request for Admissions directed to
24 Plaintiff;
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26 10. Plaintiff and Defendants have responded to the written discovery requests;
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28

1 11. The parties have been gathering Plaintiff's medical records which include treatment
2 with multiple providers in both Nevada and California, which took considerable time to compile.
3 Said records have been exchanged between the parties;
4

5 12. The parties have been engaged in dialogue with an eye toward resolving this case.
6 As a result, the parties had a joint call with one of the Plaintiff's surgeons that treated the Plaintiff
7 after the incident in question. The purpose of the call was for the parties to gain insight as to the
8 potential testimony of said witness without the need for a deposition at this time. The parties will
9 continue their dialogue and believe that it is a better use of resources to attempt to resolve the case
10 prior to the expenses associated with retaining and designating expert witnesses;
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12 13. The Plaintiff was examined by Dr. Baruch Kupperman, a potential Plaintiff's
13 expert, on November 15, 2016. In furtherance of the parties' efforts to resolve this matter the
14 Plaintiff shared the records and reports that resulted from that examination, prior to any expert
15 disclosure requirement being triggered;
16

17 14. The parties have been diligent in their discovery efforts, and if the matter is not
18 resolved, there will be a need for numerous depositions in various locations within the United
19 States, which necessitates the need for the additional time that is being requested herein;
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21 15. The following is a list of the current discovery deadlines and the parties' proposed
22 extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	October 9, 2017	January 9, 2018
Amendment of Pleadings and Addition to Parties	July 7, 2017	October 9, 2017
Expert Disclosures pursuant to Fed R. Civ. PP 26(a)(2)	August 7, 2017	November 7, 2017

ORDER

1 The Court has reviewed the Stipulation of counsel and finds Good Cause to grant said
2 Stipulation. Accordingly, **IT IS ORDERED** adopting the above Stipulation and Request to
3 Extend Discovery and other Deadlines.
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5 **IT IS SO ORDERED.**

6 **DATED** this 12 day of July, 2017.
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9 **THE HONORABLE PEGGY A. LEEN**
10 United States Magistrate Judge
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