

1 **RICHARD A. SCHONFELD, ESQ.**
 2 Nevada Bar No. 6815
 3 **CHESNOFF & SCHONFELD**
 4 520 South Fourth Street, 2nd Floor
 5 Las Vegas, Nevada 89101
 6 Telephone: (702) 84-5563
 7 rschonfeld@cslawoffice.net

8 **JOHN BURTON, Pro Hac Vice**
 9 California Bar No. 86029
 10 **THE LAW OFFICES OF JOHN BURTON**
 11 128 North Fair Oaks Avenue
 12 Pasadena, California 91103
 13 Telephone: (626) 449-8300
 14 jb@johnburtonlaw.com
 15 Attorneys for Plaintiff, Stacey M. Richards

16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

18 * * * *

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

23 **STIPULATION AND REQUEST TO EXTEND DISCOVERY**
 24 **AND OTHER DEADLINES**
 25 **(3RD REQUEST)**

26 **IT IS HEREBY STIPULATED** by and between Plaintiff, **STACEY M. RICHARDS**, by
 27 his counsel Richard A. Schonfeld, Esq., of the law offices of Chesnoff & Schonfeld, and John
 28 Burton, Esq., of the law offices of John Burton, and Heather B. Zana, Deputy 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 **May 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 the
3 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 offices
13 of John Burton. Defendants were represented by Clark B. Leslie, Chief Attorney General;

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

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

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.
25

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1 10. The parties had been gathering Plaintiff's medical records which include treatment
2 with multiple providers in both Nevada and California, and therefore it has taken considerable time
3 to compile the records;

4
5 11. 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 anticipate attending a mediation;

10
11 12. The following depositions took place on October 23, 2017, in Los Angeles,
12 California:

- 13 1. Detective Daniel Gore; and
- 14 2. Sgt. Derek Bumgardner.

15
16 13. The following is a list of the current discovery deadlines and the parties' proposed
17 extended deadlines.

18 Scheduled Event	Current Deadline	Proposed Deadline
19 Discovery Cut-off	January 9, 2018	May 9, 2018
20 Amendment of Pleadings and 21 Addition to Parties	October 9, 2017	February 9, 2018
22 Expert Disclosures pursuant to Fed R. Civ. PP 26(a)(2)	November 7, 2017	March 7, 2018
23 Rebuttal Expert Disclosures 24 pursuant to Fed R. Civ. PP. 25 26 (a)(2)	December 7, 2017	April 9, 2018
26 Interim Status Report	December 7, 2017	April 9, 2018
27 Dispositive Motions	February 7, 2018	June 7, 2018
28 Joint Pretrial Order	March 12, 2018	July 12, 2018

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14. The extension of the discovery deadline will necessitate a new trial date.

15. This is the third request for extension of time in this matter.

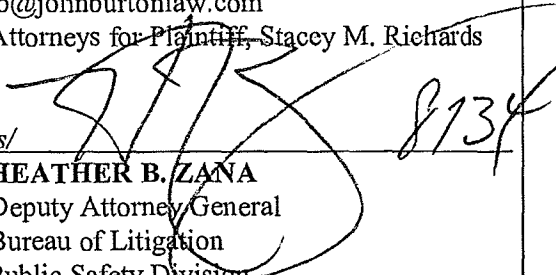
WHEREFORE, the parties respectfully request that this Court extend the discovery period by one hundred twenty [120] days from the close of current discovery deadlines. Similarly, the parties request that the expert and rebuttal expert deadlines, the dispositive motion and pretrial order deadlines be extended pursuant to the above-referenced schedule.

DATED this 15th day of November, 2017.

Respectfully submitted:

/s/
RICHARD A. SCHONFELD, ESQ.
Nevada Bar No. 6815
CHESNOFF & SCHONFELD
520 South Fourth Street, 2nd Floor
Las Vegas, Nevada 89101
Telephone: (702) 84-5563
rschonfeld@cslawoffice.net

/s/
JOHN BURTON, Pro Hac Vice
California Bar No. 86029
THE LAW OFFICES OF JOHN BURTON
128 North Fair Oaks Avenue
Pasadena, California 91103
Telephone: (626) 449-8300
jb@johnburtonlaw.com
Attorneys for Plaintiff, Stacey M. Richards

/s/  8134
HEATHER B. ZANA
Deputy Attorney General
Bureau of Litigation
Public Safety Division
100 North Carson Street
Carson City, Nevada 89701-4717
Attorneys for Defendants

