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

10 SERENA J. GOODMAN,

11 Plaintiff,

12 v.

13 M&T BANK, NATIONAL ASSOCIATION;
14 AMERASSIST AR SOLUTIONS, INC;
15 FARMERS INSURANCE FEDERAL
16 CREDIT UNION; ALLSTATE
INSURANCE, CO; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC,

17 Defendants.

Case No. 2:16-cv-01799-APG-CWH

**STIPULATION AND ORDER TO EXTEND
POST-DISCOVERY DEADLINES**

Complaint filed: July 28, 2016

19 COMES NOW the parties, by and through their undersigned counsel of record, hereby
20 stipulate and agree as follows:

21 1. On May 19, 2017, Plaintiff Serena J. Goodman (“Plaintiff”) filed her Motion for
22 Leave to File First Amended and Supplemental Complaint (the “Motion to Amend”) (ECF No.
23 45), seeking, among other things, to amend her complaint to assert potential class allegations.

24 2. On June 2, 2017, Defendant Experian Information Solutions, Inc. (“Experian”)
25 filed its Opposition to Plaintiff’s Motion for Leave to File First Amended and Supplemental
26 Complaint (ECF No. 47) and Defendant M&T Bank (“M&T”) filed its Opposition to Motion to
27

1 File First Amended and Supplemental Complaint, or, Alternatively, Motion to Sever (ECF No.
2 460.

3 3. Briefing on Plaintiff's Motion to Amend and M&T's Motion to Sever is still
4 underway.

5 4. Currently, the dispositive motion deadline is July 5, 2017. The parties agree that to
6 prevent the incurrence of unnecessary attorneys' fees, costs, and to conserve judicial resources,
7 the deadline for filing dispositive motions shall be 30 days after the Court rules on the Motion to
8 Amend and M&T's Motion to Sever, or some later date should there be a further stipulation or
9 order from the Court. The deadline for filing a pretrial order shall be 30 days after the dispositive
10 motion deadline. This is the parties' third request for an extension of the dispositive motion and
11 pretrial order deadlines, and is only being requested to avoid unnecessary briefing in light of the
12 pending Motion to Amend and M&T's Motion to Sever.

13 5. This stipulation is without prejudice to the arguments and positions taken by the
14 parties in their respective briefing relating to the Motion to Amend and M&T's Motion to Sever.

15 6. Additionally, M&T and Plaintiff are engaging in meet and confer regarding
16 whether the deposition testimony provided by M&T on June 1, 2017 adequately addressed all
17 topics. Plaintiff and M&T believe it appropriate to obtain a copy of the deposition transcript in
18 order to meaningfully complete those discussions. The parties anticipate the transcript will be
19 ready on or about June 21, and the parties will meet and confer within approximately one week
20 thereafter. If there is to be a supplemental production by M&T, the parties will alert the court
21 through a status report. If not, Plaintiff will have 21 days from the conclusion of the meet and
22 confer to file any necessary motion in connection with this meet and confer relating to M&T,
23 which will be treated as timely despite being after the close of discovery. To the extent the
24 dispositive motion deadline is not stayed as set forth in paragraph 4 above, the parties agree and
25 request that the dispositive motion deadline be extended 75 days to accommodate the discussions
26 set forth in this paragraph, without prejudice for an additional extension if motion practice is
27 required.

28

1 7. This stipulation is without prejudice for any party to seek additional relief, and any
2 party may file a dispositive motion irrespective of the stay or extension of the deadline for
3 dispositive motions herein.

4 Dated: June 16, 2017

5 NAYLOR & BRASTER

KNEPPER & CLARK LLC

6
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ORDER

IT IS SO ORDERED.

23 Dated: June 16, 2017



UNITED STATES MAGISTRATE JUDGE