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Attorneys for Defendant JAMES P. DORAN

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BROOK M. HURD, GERALDINE C. HURD,  
AND M.H., A MINOR, BY AND THROUGH  
HER GUARDIAN AD LITEM, BROOK M.  
HURD; LUIS O. VILLALOBOS; OLIVIA N.  
ESPINOZA; AND L.M.V., A MINOR, BY AND  
THROUGH HIS GUARDIAN AD LITEM  
OLIVIA N. ESPINOZA;

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,  
JAMES P. DORAN, SHAWN PAQUETTE,  
AND KRISTY KELLER

Defendants.

Case No. 2:16-cv-02011-GMN-NJK

**STIPULATION AND  
[PROPOSED] ORDER TO MODIFY THE  
SCHEDULING ORDER**

**[THIRD REQUEST]**

1           WHEREAS, on March 2, 2018 the parties filed a Joint Stipulation and Proposed Order to  
2 Modify the Scheduling Order (ECF Doc. 109) and the Order was signed by this Court on March  
3 7, 2018 (ECF Doc. 110); and

4           WHEREAS, the Order extended the deadline for the Supplemental Reports of Plaintiffs'  
5 Experts to April 13, 2018; and

6           WHEREAS, the Order continued the deadline for the Supplemental Rebuttal Reports of  
7 Defendants' Experts to April 27, 2018; and

8           WHEREAS, the Order continued the deadline by which Expert Depositions must be  
9 completed to May 25, 2018; and

10           WHEREAS, the Order continued the deadline by which Dispositive Motions must be  
11 filed to June 22, 2018; and

12           WHEREAS, the parties just concluded the depositions of Defendant CCSD's 30(b)(6)  
13 witnesses on March 19, 2018; and

14           WHEREAS, the experts for the parties have received the transcripts from twenty-eight  
15 (28) depositions since their original reports were prepared and require additional time to review  
16 and consider the testimony and prepare supplemental reports; and

17           WHEREAS, counsel for plaintiffs Marianne Lannuti has a prepaid vacation and is  
18 scheduled to be out of the country from April 8, 2018 through April 25, 2018; and

19           WHEREAS, counsel for plaintiffs Peter Alfert has a prepaid vacation and is scheduled to  
20 be out of the country from May 1, 2018 to May 19, 2018;

21           IT IS HEREBY STIPULATED by and between the parties to the above-entitled action  
22 that the deadlines are briefly extended as follows:

- 23           1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two  
24           (2) weeks to **April 27, 2018**;
- 25           2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be  
26           extended by two (2) weeks to **May 11, 2018**;
- 27           3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to  
28           **June 8, 2018**;

1 4. The deadline for Dispositive Motion shall be extended by four (4) weeks to **July 20,**  
2 **2018;**

3  
4 Date: March 27, 2018

LAW OFFICES OF PETER W. ALFERT

5 By: s/ Peter W. Alfert  
6 PETER W. ALFERT  
7 IAN A. HANSEN  
Attorneys for Plaintiff

8 Date: March 27, 2018

LAW OFFICES OF MARIANNE C. LANUTI

9 By: s/ Marianne C. Lanuti  
10 MARIANNE C. LANUTI  
11 Attorneys for Plaintiff

12 Date: March 27, 2018

GREENBERG TRAURIG

13 By: s/ Kara B. Hendricks  
14 KARA B. HENDRICKS  
15 Attorneys for Defendants Clark County School  
District, Shawn Paquette, and Kristy Keller

16 Date: March 27, 2018

HATFIELD & ASSOCIATES

17 By: s/ Trevor J. Hatfield  
18 TREVOR J. HATFIELD  
19 Attorneys for James P. DORAN

20 Date: March 27, 2018

HALL, JAFFE & CLAYTON LLP

21 By: s/ Michelle R. Schwarz  
22 STEVEN T. JAFFE  
23 MICHELLE R. SCHWARZ  
24 Attorneys for Defendants Clark County School  
District, Shawn Paquette, and Kristy Keller

1 [PROPOSED] ORDER

2 Pursuant to the Stipulation of the Parties, and good cause appearing, the following deadlines  
3 are briefly extended as follows:

- 4 1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two  
5 (2) weeks to **April 27, 2018**;
- 6 2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be  
7 extended by two (2) weeks to **May 11, 2018**;
- 8 3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to  
9 **June 8, 2018**;
- 10 4. The deadline for Dispositive Motion shall be extended by four (4) weeks to **July 20,**  
11 **2018**;

12 **IT IS HEREBY ORDERED**

13 Dated: \_\_\_\_\_ April 2, 2018

14   
15 UNITED STATES MAGISTRATE JUDGE