

1 KAEMPFER CROWELL
 Robert McCoy, No. 9121
 2 Joni A. Jamison, No. 11614
 1980 Festival Plaza Drive
 3 Suite 650
 Las Vegas, Nevada 89135
 4 Telephone: (702) 792-7000
 Facsimile: (702) 796-7181
 5 Email: rmccoy@kcnvlaw.com
 Email: jjamison@kcnvlaw.com

6 Attorneys for Plaintiff Umro Realty Corp
 7 d/b/a The Agency

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

11 UMRO REALTY CORP d/b/a THE
 AGENCY,
 12
 Plaintiff,
 13
 vs.
 14 THE AGENCY, INC.,
 15
 Defendant.

Case No. 2:16-cv-02130-JCM-CWH

**STIPULATION AND ORDER TO
 EXTEND EXPERT DISCOVERY
 DEADLINES
 (FIRST REQUEST)**

17 The parties stipulate to extend the currently scheduled expert discovery deadlines
 18 by 60 days. This is the first requested extension of these deadlines. In support of this
 19 stipulation, the parties state as follows:

20 **I. DISCOVERY COMPLETED**

21 **A. Fed. R. Civ. P. 26(a)(1) Initial Disclosures:**

22 Both parties served their initial disclosures on March 14, 2017.
 23
 24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

B. Written Discovery:

Plaintiff served defendant with interrogatories, requests for production of documents, and requests for admission on December 9, 2016. Defendant responded to these written discovery requests on January 20, 2017 and has agreed to supplement these responses by May 22, 2017.

Defendant served plaintiff with interrogatories, requests for production of documents, and requests for admission on April 21, 2017. Defendant has granted plaintiff an extension to respond or object to these written discovery requests by June 20, 2017.

C. Depositions:

Plaintiff has noticed the deposition of the following witnesses for the following dates, though the parties are still negotiating the potential rescheduling of some of these depositions:

- Kathryn Holbert June 12, 2017, 9:00 a.m.
- Marie Wdzieczkowski June 16, 2017, 9:00 a.m.
- The Agency, Inc. (30(b)(6)) June 19, 2017, time to be determined
- Randolph Reyes June 20, 2017, time to be determined
- Lenny Gervasio June 21, 2017, time to be determined

II. REMAINING DISCOVERY TO BE COMPLETED

Defendant still owes plaintiff supplemental discovery responses, as noted above. Plaintiff also still has outstanding discovery responses that are due on June 20, 2017. In addition, plaintiff plans to take the depositions noted above in June 2017. The parties may depose additional witnesses and issue additional written discovery requests to one another.

1 **III. REASON FOR EXTENSION OF DISCOVERY DEADLINES**

2 The current deadlines for disclosure of expert witnesses are June 8, 2017 for
3 initial expert disclosures and July 7, 2017 for rebuttal disclosures. Due to the outstanding
4 discovery requests that the parties are currently working on, the parties wish for additional time
5 to complete this written discovery before they have to disclose their expert witnesses. In
6 addition, plaintiff wishes to complete the depositions noted above before its expert disclosures
7 are due. The parties have thus agreed to a modest 14-day extension of the expert discovery
8 deadlines only, to allow the parties sufficient time to finish their written discovery and depose
9 these witnesses. This is the first request to extend these deadlines. The parties do not request to
10 extend any other currently scheduled deadlines at this time.

11 **IV. PROPOSED CHANGES TO DISCOVERY DEADLINES**

12 **A. Fed. R. Civ. P. 26(a) Disclosures (Experts):**

13 The parties propose that the deadlines for Fed. R. Civ. P. 26(a)(2) disclosure of
14 experts and expert reports be extended as follows:

- 15 1. The parties shall disclose experts and expert reports by Thursday, June 22,
16 2017, which is 46 days before the discovery cut-off date;
- 17 2. The parties shall disclose rebuttal experts and their reports by Friday, July
18 21, 2017, which is 17 days before the discovery cut-off date.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

B. Other Deadlines:

The parties do not request that the Court extend any other deadlines at this time.

KAEMPFER CROWELL

FISHERBROYLES, LLP

By /s/ Joni A. Jamison
Robert McCoy, No. 9121
Joni A. Jamison, No. 11614
1980 Festival Plaza Drive
Suite 650
Las Vegas, Nevada 89135

By /s/ Rob Phillips
Rob Phillips
FisherBroyles, LLP
5670 Wilshire Blvd, Suite 1800
Los Angeles, CA 90036

Attorney for Defendant

BARNES & THORNBURG LLP

By /s/ Jonathan P. Froemel
Michael A. Carrillo (*pro hac vice*)
Jonathan P. Froemel (*pro hac vice*)
Genevieve E. Charlton (*pro hac vice*)
One North Wacker Drive
Suite 4400
Chicago, Illinois 6060

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: May 19, 2017