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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ROBIN NOVOTNY, an Individual,

12 Plaintiff,

13 v.

14 OUTBACK STEAKHOUSE OF FLORIDA,
 LLC d/b/a OUTBACK STEAKHOUSE, a
 15 Florida Limited Liability Company; DOE
 EMPLOYEE I, an Individual; DOES I-X; and
 16 ROE BUSINESS ENTITIES XI-XX, inclusive,

17 Defendants.

CASE NO.: 2:16-cv-02716-RFB-NJK

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES
 (First Request)**

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 19 Plaintiff, ROBIN NOVOTNY, by and through her counsel of record, CLAGGETT & SYKES
 20 LAW FIRM; Defendant, OUTBACK STEAKHOUSE OF FLORIDA, LLC d/b/a OUTBACK
 21 STEAKHOUSE, by and through its counsel of record WILSON ELSER MOSKOWITZ EDELMAN
 22 & DICKER, LLP, hereby stipulate as follows:

23 1. Discovery completed: to date, the parties have participated in a Fed. R. Civ. P. 26(f)
 24 Conference, made initial disclosures of documents and witnesses and have propounded and responded
 25 to written discovery.

26 2. Discovery remaining to be completed: The parties need to disclose initial experts,
 27 rebuttal experts, conduct the depositions of Plaintiff and Defendant's 30(b)(6) witnesses, and any
 28 additional witnesses as needed.

1 3. Description of why remaining discovery has not been completed within the time limits
2 previously set by the Court: Plaintiff recently received discovery responses from the Defendant that
3 identified witnesses and documents that were not previously disclosed. Plaintiff believes that some
4 of these witnesses needs to be deposed prior to the disclosure of expert witnesses. Defendant disagrees
5 with this assertion.

6 Plaintiff also plans on deposing Defendant's 30(b)(6) witnesses and noticing a site inspection.
7 Plaintiff's counsel is 35 weeks pregnant and scheduled to have a baby in March 2017 and will need
8 time to take the necessary depositions. Outback is capable of meeting the current deadlines but is
9 agreeable to the accommodation based on Plaintiff's counsel's due date.

10 4. Proposed schedule for completing all remaining discovery: Based on the foregoing, the
11 parties respectfully request that the Court grant their joint request to extend the discovery deadlines,
12 as follows:

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	<u>Current Dates</u>	<u>Proposed Dates</u>
Last day to complete discovery	May 30, 2017	July 31, 2017
Last day to make initial expert disclosures	March 31, 2017	May 31, 2017
Last day to make rebuttal expert disclosures	May 1, 2017	June 30, 2017

6. Pursuant to Local Rule 26-4, this Stipulation is being submitted to the Court more than twenty-one (21) days before the first deadline being extended.

IT IS SO STIPULATED.

Dated: March 1, 2017

Dated: March 1, 2017

<p>CLAGGETT & SYKES LAW FIRM</p> <p><i>/s/ Jennifer Morales</i></p> <hr/> <p>Sean K. Claggett, Esq. Nevada Bar No. 008407 Jennifer Morales, Esq. Nevada Bar No. 008829 Matthew S. Granda, Esq. Nevada Bar No. 012753 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107 <i>Attorneys for Plaintiff</i></p>	<p>WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP</p> <p><i>/s/ Michael P. Lowry</i></p> <hr/> <p>Michael P. Lowry, Esq. 300 S. 4th St., 11th Floor Las Vegas, Nevada 89101 <i>Attorneys for Defendant, OUTBACK STEAKHOUSE OF FLORIDA d/b/a OUTBACK STEAKHOUSE</i></p>
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ORDER

IT IS SO ORDERED.

DATED this 2nd day of March , 2017.



 UNITED STATES MAGISTRATE JUDGE