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

10 DREE ANN CELLEMME,

11 Plaintiff,

12 v.

13 MERRICK GARLAND, in his official
14 capacity as Attorney General of the United
States,

15 Defendant.

Case No. 2:16-cv-02539-JAD-DJA

Stipulation and Order to
Extend Certain Discovery Deadlines
(Sixth Request)

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17 Pursuant to LR IA 6-1 and LR 26-3, the parties request a 150-day extension of
18 certain discovery deadlines as, and for the reasons, set forth below. This stipulation is filed
19 at least 21 days before the earliest deadline to be extended (close of discovery). The purpose
20 for the requested extension is the parties' good faith intention to mediate this case. This is
21 the sixth request for an extension of the discovery schedule.

22 **DISCOVERY COMPLETED**

23 The parties have completed the following disclosures and discovery:

24 Defendant served Initial Disclosures of Witnesses and Documents and three
25 supplement thereto.

26 Plaintiff served Initial Disclosures of Witnesses and Documents and one
27 supplement thereto.

28 Plaintiff served Discovery Request, First Supplemental Discovery Request For

1 Production of Documents, Second Supplemental Discovery Request for Production of
2 Documents, and Defendant responded to them.

3 Defendant served first and second sets of Requests for Production and
4 Interrogatories, and Plaintiff responded to Defendant's second sets of discovery requests.

5 On July 31, 2017, Defendant took the Deposition of Officer Roque Martinez.

6 **DISCOVERY REMAINING**

7 Plaintiff and Defendant intend to depose the Parties, their representatives, and any
8 other percipient witnesses regarding the allegations in this case. Based on the outcome of
9 these depositions, the parties may need to send additional written discovery.

10 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

11 The parties agreed that it will be beneficial to try to resolve this case through
12 mediation and are currently looking into possible mediators and dates to get the mediation
13 scheduled. In the event the mediation is not successful, the parties will need the time to
14 complete the remaining discovery. This request is made in good faith, not for the purpose
15 of delay.

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EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed extended deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cutoff	03/17/2023	08/18/2023
Dispositive Motions	04/14/2023	09/18/2023
Proposed Joint Pretrial Order	05/12/2023	10/18/2023 ¹

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 31st day of January 2023.

GARMAN TURNER GORDON LLP

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: February 1, 2023

¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.