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17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 COURTNEY KNIGHT,
20 Plaintiff,

21 v.

22 BEASLEY BROADCASTING OF
23 NEVADA, LLC, a North Carolina
24 Corporation; BEASLEY MEDIA GROUP,
25 INC., a Delaware Corporation; BEASLEY
26 BROADCASTING GROUP, INC., a
27 Delaware Corporation; does I THROUGH X,
28 and ROE BUSINESS ENTITIES I through X,
inclusive,
Defendant.

Case No.: 2:16-cv-02648-JAD-PAL

**STIPULATION FOR EXTENSION AND
CONTINUANCE OF TIME TO HOLD
26(F) CONFERENCE and RELATED
DEADLINES**

[First Request]

22 On July 22, 2016, Plaintiff Courtney Knight filed a complaint in state court commencing
23 this suit. On October 19, 2016, Plaintiff filed her First Amended Complaint of Discrimination,
24 Retaliation, FMLA Violations, and Employment-Related Breach of Contract and Related Tort,
25 against named Defendants Beasley Broadcasting of Nevada, LLC, Beasley Media Group, Inc.,
26 and Beasley Broadcasting Group, Inc. (hereinafter collectively referred to "Defendants".)

27 All three Defendants were then served with the Complaint and First Amended Complaint.
28 On November 17, 2016, the three served Defendants timely removed the matter to the U.S.

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1 District Court, District of Nevada. ECF Doc. 01. Thereafter, the Court issued a Minute Order
2 setting forth various deadlines in this removed matter. ECF Doc. 03. On November 23, 2016,
3 all three named Defendants filed a joint answer. ECF No. 05.

4 Pursuant to that Minute Order, the parties are preparing to file their Joint Status Report
5 on or before the Court-ordered deadline of December 21, 2016, and are expecting that eventually
6 this matter will be sent to the Court's ENE program pursuant to LR 16-6. The parties have been
7 discussing the timing and content of the FRCP 26(f) conference (with a current deadline of
8 December 23, 2016) and their Initial Disclosures to follow thereafter, along with the possibility
9 of early disclosures to each other in furtherance of ENE discussions, and are cooperating with
10 each other.

11 For these reasons, at the initiation of undersigned Plaintiff's counsel below, and due to the
12 FRCP 26(f) deadline being this week, with the upcoming holidays both this week and next, and
13 the unavailability of counsel over this week and for the next two weeks, with Plaintiff's counsel
14 making out of state holiday trip, and having a settlement conference in another matter, the parties
15 are asking for a three week extension of the deadline for the FRCP 26(f) conference under LR
16 26-1(a).

17 The parties and their counsel are asking that the Court approve this extension to allow them
18 to conduct the 26(f) conference on the date which is now mutually convenient to all:

19 **Date:** January 18, 2017
20 **Time:** 10:00 am
21 **Location:** Office of Defendants' counsel, Wilson Elser
22 300 So. 4th St., 11th Floor
23 Las Vegas, NV 89101

24 The parties also ask that the Court approve a commensurate extension for the deadlines
25 triggered by the holding of the FRCP 26(f) conference, i.e. the deadline for Initial Disclosures
26 and the submission of the Discovery Plan and Scheduling Order to fourteen days thereafter, i.e.
27 an extension for doing until **February 1, 2017.**

27 / / / /
28 / / / /

1 This is the first request for the extension of this 26(f) deadline, and it is believed that it
2 will not unduly impede or delay the progress of this case.

3
4 Respectfully submitted:

5 Dated: 12-20-16

Dated: 12-20-16

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14
15
16 **IT IS SO ORDERED.**

Dated: December 28, 2016

17
18 
19 PEGGY A. LEEN

United States Magistrate Judge