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

9 KEVIN RIDEOUT,

2:16-CV-02817-RFB-(VCF)

10 Plaintiff,

*Stipulation and Order for Extension of
 Discovery Deadlines*

11 vs.

(First Request)

12 CASHCALL, INC.,

13 Defendant.

14 In accordance with LR 26-4, the plaintiff, Kevin Rideout, and the defendant,
 15 CashCall, Inc., stipulate as follows:

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 17 **Statement of discovery completed**

- 18 1. On April 6, 2018, Rideout served CashCall with Plaintiff's Interrogato-
 19 ries, Request for Admissions, and Requests for Production of Documents.
 20 2. On May 17, 2018, Rideout served Plaintiff's Initial Disclosures.
 21 3. On May 23, 2018, CashCall served its Initial Disclosures.
 22 4. On June 15, 2018, CashCall served its Answers to Requests for Admis-
 23 sion.
 24 5. On June 15, 2018, CashCall served its Amended Answers to Requests
 25 for Admission.
 26 6. On June 20, 2018, CashCall served its Answers to Interrogatories.

1 7. On June 20, 2018, CashCall served its Responses to Requests for Pro-
2 duction of Documents.

3 8. On June 21, 2018, Rideout served Plaintiff's Notice of Taking Deposi-
4 tion of Person Most Knowledgeable by Stenographer and/or Videotape.

5 9. On June 26, 2018, the parties filed a Stipulated Protective Order (ECF
6 No. 37).

7 **Statement of discovery that remains to be completed**

8 Rideout intends to take the deposition of the person most knowledgeable of
9 CashCall and have an expert witness issue an expert report. CashCall intends to
10 take Rideout's deposition and issue written discovery to Rideout. In addition, Cash-
11 Call may identify a rebuttal expert.

12 **The reasons why discovery was not completed within the time limit set by the dis-**
13 **covery plan**

14 In May 2018, counsel for CashCall (who is a solo practitioner) suffered two
15 deaths in his family. He also celebrated three graduations of three of his children.
16 CashCall's counsel also filed three substantial briefs (appellate, summary judgment,
17 and preliminary injunction) in three different cases in May. The combination of
18 these events delayed counsel's ability to push discovery in this case. Given these
19 events, Rideout's counsel graciously granted extensions of time to respond to discov-
20 ery. Although Rideout noticed the deposition of CashCall's person most knowledg-
21 eable for July 27 (before the expert disclosure deadline), Rideout has agreed to con-
22 tinue the deposition to accommodate CashCall's counsel. But Rideout needs to take
23 the deposition of CashCall's person most knowledgeable before it can complete its
24 expert disclosures.

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1 **A proposed schedule for completing all discovery**

2 The parties are requesting a 60-day extension of the unexpired discovery
3 deadlines. Hence the parties stipulate to the following deadlines:

- 4 1. Discovery cut-off: December 4, 2018.
5 2. Deadline for initial expert disclosures: October 4, 2018.
6 3. Deadline for rebuttal expert disclosures: November 5, 2018.
7 4. Deadline to file dispositive motions: January 4, 2019.
8 5. Deadline to file interim status report: October 4, 2018.
9 6. Deadline to file pretrial order: February 4, 2019. If a party files a dis-
10 positive motion, the date for filing the pretrial order shall be suspended until 30
11 days after the decision on the dispositive motion or further order of the Court.

12 Dated this 24th day of July 2018.

13 David J. Merrill, P.C.

Haines & Krieger, LLC

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15 By: /s/ David J. Merrill
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22 IT IS SO ORDERED:

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25 UNITED STATES MAGISTRATE JUDGE

26 DATED: 7/25/14
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