

1 LEONARD T. FINK, ESQ.
 Nevada Bar No. 6296
 2 NAKESHA S. DUNCAN, ESQ.
 Nevada Bar No. 11556
 3 **SPRINGEL & FINK LLP**
 4 10655 Park Run Drive, Suite 275
 Las Vegas, Nevada 89144
 5 Telephone: (702) 804-0706
 6 Facsimile: (702) 804-0798
 E-Mail: lfink@springelfink.com
 7 nduncan@springelfink.com

8 Attorneys for Defendants,
 9 SECURITAS SECURITY SERVICES USA, INC.
 and WAL-MART STORES, INC. d/b/a
 10 WALMART SUPERCENTER #3473

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 EDDIE HERNANDEZ,
 14 Plaintiff,
 15 vs.
 16 WAL-MART STORES, INC. d/b/a WALMART
 17 SUPERCENTER #3473; SECURITAS SECURITY
 18 SERVICES USA, INC.; UNKNOWN SECURITY
 19 GUARD; DOES 1-V, inclusive; ROE BUSINESS
 ENTITIES I-V, inclusive,
 20 Defendants.

Case No.: 2:16-cv-02917

21 **STIPULATION TO EXTEND DISCOVERY**
 22 **[THIRD REQUEST]**

23 The parties, by and through their respective, undersigned, attorneys of record, hereby submits
 this Stipulation and Order to Extend Discovery Deadlines, as detailed below.

24 Pursuant to LR IA 6-1, this is the third stipulation for extension of time for discovery submitted
 25 by the parties. Pursuant to LR II 26-4, the parties agree to extend the remaining discovery deadlines to
 26 allow each party to complete the remaining, necessary discovery. As the parties wish to conduct
 27 mediation, good cause exists to allow the parties additional time to conduct the remaining discovery,
 28 including depositions.

1 **A. Discovery Completed**

2 The following discovery has been completed:

- 3 1. Plaintiff and Defendants have exchanged FRCP 26 disclosures of witnesses and documents,
4 and supplements thereto.
- 5 2. Defendant SECURITAS SECURITY SERVICES USA, INC. has propounded written
6 discovery upon Plaintiff.
- 7 3. Plaintiff has propounded written discovery upon Defendants.
- 8 4. Defendants have responded to Plaintiff's written discovery.
- 9 5. Plaintiff has responses to Defendants' written discovery.
- 10 6. An independent medical examination of Plaintiff has been completed.
- 11 7. Defendants have disclosed their initial expert witness.

12 **B. Discovery that Remains to Be Completed**

- 13 1. Designation of Plaintiff's initial expert witnesses.
- 14 2. Designation of rebuttal expert witnesses.
- 15 3. Deposition of Plaintiff.
- 16 4. Deposition of Defendants' FRCP 30(b)(6) witnesses.
- 17 5. Depositions of Plaintiff's treating physicians, if necessary.
- 18 6. Depositions of experts.
- 19 7. Additional written discovery, if necessary.

20 **C. Reason Why Remaining Discovery Was Not Completed**

21 Now, that the majority of discovery has been completed, the parties wish to engage in mediation,
22 in an attempt to settle this matter. Pursuant to the parties' and their clients' schedules, they are working
23 to schedule mediation in January 2018. This third extension will ensure that the parties have time to
24 disclosure appropriate experts and schedule and take necessary depositions, prior to trial. It will also
25 ensure that the parties do not waste unnecessary litigation money on expert reports and/or depositions, if
26 this matter is able to be settled at mediation. Based on the foregoing, good cause exists to extend the
27 remaining discovery deadlines.

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1 **D. Proposed Schedule**

2 The parties propose the following extended schedule:

<u>Discovery to be Completed</u>	<u>Current Deadlines</u>	<u>Proposed Deadlines</u>
Initial expert disclosures	October 16, 2017	February 16, 201 7 8
Rebuttal expert disclosures	November 15, 2017	March 16, 201 7 8
Close of Discovery	December 17, 2017	April 16, 2018
Dispositive motions	January 16, 2017	May 16, 2018
Pre-Trial Order	February 15, 2018	June 15, 2018

9 IT IS SO STIPULATED.

10 DATED this 16th day of November, 2017.

DATED this 16th day of November, 2017.

11 SPRINGEL & FINK LLP

GAZDA & TADAYON

12 /s/ Nakesha S. Duncan, Esq.

/s/ Lewis Gazda, Esq.

13 _____
14 LEONARD T. FINK, ESQ.

15 Nevada Bar No. 6296

LEWIS GAZDA, ESQ.

16 NAKESHA S. DUNCAN, ESQ.

Nevada Bar No. 4269

17 Nevada Bar No. 11556

AFSHIN TADAYON, ESQ.

10655 Park Run Drive, Suite 275

Nevada Bar No. 6517


Las Vegas, Nevada 89144

2600 South Rainbow Blvd., Suite 200
Las Vegas, NV 89146

18 **ORDER**

19 Based on the parties' stipulation [] and good cause appearing, IT IS HEREBY ORDERED that
20 the remaining discovery deadlines are extended pursuant to the parties' stipulation.

21 Dates this 17th November
22 Dates this ___ day of _____, 2017.



23 _____
24 UNITED STATES MAGISTRATE JUDGE

25 If dispositive motions are filed, the deadline
26 for filing the joint pretrial order will be suspended until 30 days after
27 decision on the dispositive motions or further court order.
28