Michael P. Balaban State Bar No. 9370 1 LAW OFFICES OF MICHAEL P. BALABAN 2 10726 Del Rudini Street Las Vegas, NV 89141 3 (702)586-2964 Fax: (702)586-3023 4 E-Mail: mbalaban@balaban-law.com 5 Attorney for Plaintiff 6 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 12 ROLANDO LEZAMA, CASE NO. 2:17-cv-00086-JAD-VCF 13 STIPULATION AND REQUEST TO EXTEND DISCOVERY AND OTHER 14 **DEADLINES** Plaintiff, (First Request) 15 VS. 16 CLARK COUNTY, a political subdivision, and 17 municipality including its department, CLARK COUNTY, DEPARTMENT OF AVIATION, 18 19 Defendant. 20 21 22 COME NOW, Plaintiff, named above, by and through his counsel of record, MICHAEL P. 23 BALABAN, ESQ., and Defendant, named above, by and through their counsel of record, 24 WHITNEY J. SELERT, ESQ., pursuant to Local Rule 26-4, herein stipulate, agree and make joint 25 application to extend the discovery cut-off and related dates for a period of ninety (90) days up to 26 and including March 21, 2018. The present discovery cut-off date is December 21, 2017 and no 27 calendar call date or trial date has been set. 28 1

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This request is being made timely in accordance with LR 26-4 and the prior scheduling order which provides that requests for further discovery extensions must be made no later than twenty-one (21) days before the existing discovery cut-off date, or here by November 30, 2017. This is the first request for an extension.

This stipulation is made and based upon the following factors.

Although counsels for both parties have been working diligently to complete the discovery in this case, they still have to take depositions and the current discovery cut-off is only a little over a month away. In addition there is a meet and confer scheduled for November 20, 2017 which could result in a motion to compel further discovery responses if a resolution to the discovery dispute is not agreed to.

To date the parties have both made their initial disclosures to the other side and both Plaintiff and Defendant have propounded interrogatories and requests for production of documents on the other side which have been responded to. Defendant has also propounded requests for admissions on Plaintiff which have also been responded to. In addition Defendant has designated an expert witness.

Finally Defendant has currently noticed Plaintiff's deposition for November 29, 2017 and Plaintiff has requested dates to depose Defendant employees Sandy Jeantete, Christine Santiago, James Chrisley, Lette Bonilla and Terrence McCarthy.

As set forth above, the attorneys for the parties have diligently worked to complete discovery as expediently as possible and will continue to try to complete the remaining discovery in as expedient a manner as possible.

Given the above, the parties request that the discovery period be extended as follows:

Activity	Former Date	Requested Date
Discovery Cut-Off Date	12/21/17	03/21/18
Dispositive Motions	01/22/18	04/23/18

1	Pretrial Order	02/21/18	05/23/18 ¹	
2	In accordance with LR 26-4 the parties understand that any further requests for discovery			
3	extensions must be made no later than twenty-one days before the new proposed discovery cut-off			
4	date, ie. March 21, 2018, or no later than twenty-one days before any other deadline sought to be			
5	extended.			
6				
7	LAW OFFICES OF MICHAEL P.	FISHER & PHILLIPS, LLP		
8	BALABAN			
9	/s/ Michael P. Balaban	/s/ Whitney J. Selert		
10	Michael P. Balaban, Esq. 10726 Del Rudini St.	Whitney J. Selert, Esq. 300 S. Fourth Street, Suite	1500	
11	Las Vegas, NV 89141 Attorney for Plaintiff	Las Vegas, NV 89101 Attorney for Defendant		
12		·		
13	Dated: November 16, 2017	Dated: November 16, 2017		
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16		IT IS SO ORDERED:		
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20		UNITED STATES MAGIS Dated: November <u>16</u> , 201		
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28 | Or 30 days after the decision on the last dispositive motion.