

1 **GEORGE M. RANALLI, ESQ.**  
 Nevada Bar No. 5748  
 2 **BENJAMIN J. CARMAN, ESQ.**  
 Nevada Bar No. 12565  
 3 **RANALLI ZANIEL FOWLER & MORAN, LLC**  
 2400 W. Horizon Ridge Parkway  
 4 Telephone: (702) 477-7774  
 Facsimile: (702) 477-7778  
 5 [ranalliservice@ranallilawyers.com](mailto:ranalliservice@ranallilawyers.com)  
 Attorneys for Defendant  
 6 State Farm Mutual Automobile Insurance Company

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

9  
 10 **ETHAN ALAN ADAIR (FKA ALAN**  
**VEYTSMAN), individually**

11 Plaintiff,

2:17-cv-00421-RFB-CWH

12 v.

\*SUBMITTED IN COMPLIANCE  
 WITH LR 26-1(e)\*

13 **STATE FARM MUTUAL AUTOMOBILE**  
**INSURANCE COMPANY, individually;**  
 14 **DOES I - X, and ROE**  
 15 **CORPORATIONS I - X,**

16 Defendant

17  
 18 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
**(SECOND REQUEST)**  
 19

20 Pursuant to Local Rules 6-1 and 26-4, the parties, by and  
 21 through their respective counsel of record, hereby stipulate to  
 22 and request that the Court extend the deadlines by ninety days.  
 23  
 24

RANALLI ZANIEL FOWLER & MORAN, LLC  
 2400 W. HORIZON RIDGE PARKWAY  
 HENDERSON, NEVADA 89052  
 TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

1           **A.     STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

2     The following discovery has been completed by the parties:

- 3           1.     Plaintiff's List of Witnesses and Documents Produced
- 4                     Pursuant to FRCP 26 was produced on October 4, 2017;
- 5           2.     Defendant's Disclosure of Witnesses and Exhibits
- 6                     Pursuant to FRCP 26(f) was produced on October 9,
- 7                     2017;
- 8           3.     Plaintiff's First Supplemental List of Witnesses and
- 9                     Documents Produced Pursuant to FRCP 26;
- 10           4.     Plaintiff's Second Supplemental List of Witnesses and
- 11                    Documents Produced Pursuant to FRCP 26;
- 12           5.     Defendant's First Supplemental Disclosure of Witnesses
- 13                    and Exhibits Pursuant to FRCP 26(f);
- 14           6.     Defendant's First Set of Interrogatories to Plaintiff
- 15           7.     Defendant's First Set of Requests for Production of
- 16                    Documents to Plaintiff;
- 17           8.     Defendant's First Set of Requests for Admissions to
- 18                    Plaintiff;
- 19           9.     Plaintiff's First Set of Interrogatories to Defendant;
- 20           10.    Plaintiff's First Set of Requests for Production of
- 21                    Documents to Defendant
- 22           11.    Plaintiff's First Set of Requests for Admissions to
- 23                    Defendant;
- 24           12.    Plaintiff has noticed the deposition of Nikki Clary;

- 1 13. Plaintiff has noticed the deposition of Sandra Gowdy;
- 2 14. Deposition of Plaintiff;
- 3 15. Defendant's Responses to Plaintiff's Requests for
- 4 Admissions;
- 5 16. Plaintiff's Responses to Defendant's Request for
- 6 Admissions;
- 7 17. Defendant's Responses to Plaintiff's Interrogatories;
- 8 18. Plaintiff's Responses to Defendant's First Set of
- 9 Interrogatories;
- 10 19. Defendant's Responses to Plaintiff's Requests for
- 11 Production of Documents;
- 12 20. Plaintiff's Responses to Defendant's First Set of
- 13 Request for Production of Documents;
- 14 21. Plaintiff has noticed the deposition of the Person
- 15 Knowledgeable of State Farm;
- 16 22. Defendant's Designation of Expert Witnesses;
- 17 23. Plaintiff's Designation of Expert Witnesses and
- 18 Documents;

19 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**  
20 **COMPLETED:**

- 21 1. Depositions of the Person Most Knowledgeable from
- 22 Plaintiff's medical providers relevant to treatment
- 23 rendered to Plaintiff since the date of this accident;
- 24

- 1           2.    Disclosures of Plaintiff and Defendant's rebuttal
- 2                    experts;
- 3           3.    Depositions of Plaintiff and Defendant's experts;
- 4           4.    Obtaining Plaintiff's medical records;

5   **A.    THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED**  
6   **WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

7           Both parties have been working diligently to move this  
8 matter forward and have noticed depositions and served  
9 discovery, including their designation of experts in this  
10 matter. Both parties are aware of the numerous depositions they  
11 would like to take and the conflicting schedules of not only  
12 counsel, but the deponents. In addition, the parties recently  
13 exchanged expert disclosures and both parties believe they will  
14 need more time to prepare their experts as well as retain  
15 additional rebuttal experts. The parties are requesting a  
16 ninety day extension to complete all remaining discovery and  
17 depositions. This extension will allow the parties to  
18 accommodate counsels' schedule as well as the remaining  
19 deponents. Further, this will allow the parties to obtain the  
20 necessary experts needed.

21   **D.    A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	<b>Old Deadline</b>	<b>New Deadline</b>
22		
23	Discovery Cut off:	07/16/2018                   10/15/2018

1 Amending the Pleadings 04/17/2018 CLOSED  
& Adding Parties:  
2  
3 Expert Disclosure: 05/17/2018 CLOSED  
4 Rebuttal of Experts: 06/15/2018 09/17/2018  
5 Interim Status Report: 05/17/2018 08/16/2018  
6 Dispositive Motions: 08/15/2018 11/14/2018  
7 Pretrial Order: 09/14/2018 12/14/2018

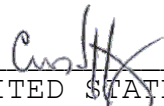
8 **F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY**  
9 **DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.**

10 Dated: May 29, 2018 Dated: May 29, 2018  
11 RANALLI ZANIEL FOWLER & MORAN, THE POWELL LAW FIRM  
12 LLC  
13 /s/ Benjamin Carman /s/ Paul Powell  
14 GEORGE M. RANALLI, ESQ. PAUL D. POWELL, ESQ.  
15 Nevada Bar No. 5748 Nevada Bar No. 7488  
16 BENJAMIN J. CARMAN, ESQ. MICHAEL A. KRISTOF, ESQ,  
17 Nevada Bar No. 12565 Nevada Bar No. 7780  
18 2400 W. Horizon Ridge Parkway 4435 South Eastern Avenue  
19 Henderson, Nevada 89052 Las Vegas, Nevada 89119  
20 Attorneys for Defendant Attorney for Plaintiff

21 **ORDER**

22 IT IS SO ORDERED:

23 Dated: May 30, 2018

24   
UNITED STATES DISTRICT COURT  
MAGISTRATE JUDGE