

1 VERONICA ARECHEDERRA HALL
Nevada Bar No. 5855
2 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
3 Las Vegas, Nevada 89118
702.893.3383
4 FAX: 702.893.3789
5 Attorneys for Las Vegas Operations, LLC, d/b/a
Life Care Center of Las Vegas
6

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 GODFREY O. MERE,
11 Plaintiff,

12 vs.

13 LAS VEGAS OPERATIONS, LLC, d/b/a
14 LIFE CARE CENTER OF LAS VEGAS,
15 Defendant.

CASE NO. 2:17-cv-00698-JCM-NJK

STIPULATION AND ORDER TO EXTEND
EXPERT DISCLOSURE DEADLINES

(FIRST REQUEST)

16
17 Pursuant to LR 26-4, the parties, hereby stipulate and request this Court extend expert
18 disclosure deadlines in the above-captioned case twenty (21) days, up to and including September
19 21, 2017. In support of this Stipulation and Request, the parties state as follows:

- 20 1. On May 15, 2017, Plaintiff filed his Amended Complaint.
- 21 2. On June 5, 2017, Defendant filed its Answer to Plaintiff's Amended Complaint.
- 22 3. On June 14, 2017, the parties prepared and filed their Proposed Discovery Plan and
23 Scheduling Order. The current discovery cut-off date is October 30, 2017.
- 24 4. The parties exchanged initial disclosures pursuant to Rule 26(a)(1) on June 27,
25 2017 and June 29, 2017.
- 26 5. The parties participated in an Early Neutral Evaluation ("ENE") on July 7, 21017.
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. Defendant served written discovery requests on July 10, 2017. Plaintiff is in the process of responding to those requests.

7. Defendant has served *subpoenas duces tecum* and other requests for documents to third parties.

8. The parties are in settlement discussions, and are considering scheduling a mediation.

DISCOVERY REMAINING

1. Plaintiff will serve written discovery requests on Defendant.

2. Defendant will take the deposition of Plaintiff.

3. Plaintiff will take the deposition of Defendant’s witnesses, including Defendant’s former Director of Nursing, Lori Meadows.

4. The parties will evaluate whether to retain testifying experts, and, if so, there will be expert discovery.

5. The parties will take the depositions of any and all other witnesses garnered through discovery.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery, and participate in alternative dispute resolution.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

As stated above, the parties participated in an ENE on July 7, 2017. Although the matter did not resolve at the ENE, the parties have continued settlement discussions and are contemplating scheduling a mediation. As such, the parties would like to postpone expert discovery to focus resources on resolving the matter.

In light of these circumstances, the parties require additional time to complete discovery.

1 The following is a list of the current discovery deadlines and the parties' proposed extended
2 deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Expert Disclosures	<i>August 31, 2017</i>	<i>September 21, 2017</i>
Rebuttal Expert Disclosures	<i>October 2, 2017</i>	<i>October 19, 2017</i>

6 APPROVED AS TO FORM AND CONTENT.

8 DATED this 10th day of August, 2017.

DATED this 10th day of August, 2017.

9 LEWIS BRISBOIS BISGAARD
& SMITH LLP

GUINNESS LAW OFFICES

12 By /s/ Veronica Arechederra Hall
13 VERONICA ARECHEDERRA HALL
14 Nevada Bar No. 5855
15 6385 S. Rainbow Boulevard, Suite 600
16 Las Vegas, Nevada 89118
17 Tel. 702.893.3383

/s/ Guinness Ohazuruike
GUINNESS OHAZURUIKE
Nevada Bar No. 11231
6845 W. Charleston Blvd., #A
Las Vegas, NV 89117
Telephone (702) 473-9300
Facsimile: (702) 920-8112

Attorneys for Defendant

Attorneys for Plaintiff

18 **ORDER**

20 **IT IS SO ORDERED:**

23 DATED: August 10, 2017

22 
23 _____
24 UNITED STATES MAGISTRATE JUDGE