

1 VERONICA ARECHEDERRA HALL  
2 Nevada Bar No. 5855  
3 LEWIS BRISBOIS BISGAARD & SMITH LLP  
4 6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
6 702.893.3383  
7 FAX: 702.893.3789

8 Attorneys for Las Vegas Operations, LLC, d/b/a  
9 Life Care Center of Las Vegas

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 GODFREY O. MERE,

13 Plaintiff,

14 vs.

15 LAS VEGAS OPERATIONS, LLC, d/b/a  
16 LIFE CARE CENTER OF LAS VEGAS,

17 Defendant.

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

STIPULATION AND ORDER TO EXTEND  
EXPERT DISCLOSURE DEADLINES  
(FIRST REQUEST)

18 Pursuant to LR 26-4, the parties, hereby stipulate and request this Court extend expert  
19 disclosure deadlines in the above-captioned case twenty (21) days, up to and including September  
20 21, 2017. In support of this Stipulation and Request, the parties state as follows:

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

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	August 31, 2017	September 21, 2017
Rebuttal Expert Disclosures	October 2, 2017	October 19, 2017

6 APPROVED AS TO FORM AND CONTENT.  
7

8 DATED this 10th day of August, 2017.

9 DATED this 10th day of August, 2017.

10 LEWIS BRISBOIS BISGAARD  
& SMITH LLP

GUINNESS LAW OFFICES

11  
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  
18 Attorneys for Defendant

19 /s/ Guinness Ohazuruike  
20 GUINNESS OHAZURUIKE  
21 Nevada Bar No. 11231  
22 6845 W. Charleston Blvd., #A  
23 Las Vegas, NV 89117  
24 Telephone (702) 473-9300  
25 Facsimile: (702) 920-8112  
26  
27  
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Attorneys for Plaintiff

**ORDER**

21 IT IS SO ORDERED:  
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23 DATED: August 10, 2017

24 UNITED STATES MAGISTRATE JUDGE

