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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT CONWAY, Plaintiff, vs. NATIONAL GENERAL INSURANCE COMPANY, duly authorized to conduct business in the State of Nevada; DOES I through X, and ROE CORPORATIONS I through X, inclusive, Defendant.	CASE NO.: 2:17-cv-00748- JCM-GWF **STIPULATION AND ORDER TO EXTEND DEFENDANT'S TIME TO RESPOND TO WRITTEN DISCOVERY AND PLAINTIFF'S DEADLINE TO FILE AN OPPOSITION TO DEFENDANT'S MOTION FOR PROTECTIVE ORDER (DOC #18)** **(First Request)**

Pursuant to LR 7-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the time for Defendant to respond to Plaintiff's written discovery by fourteen (14) days and extend Plaintiff's time to Oppose Defendants Motion for a Protective Order (Doc. #18, herein) by fourteen days in the above-captioned case The parties do not believe this will affect the dates as set forth in the current Stipulated Amended Discovery Plan and Scheduling Order. In support of this Stipulation and Request, the parties state as follows:

1. On January 31, 2017 Plaintiff filed his Complaint in the eight Judicial District Court of Clark County, NV.

2. Plaintiff served Defendant with Complaint February 15, 2017;

3. Defendant filed its Petition for Removal and Answer on March 15, 2017;

4. March 30, 2017 Plaintiff filed its Motion to Remand to State Court which Defendant opposed;

5. On April 26, 2017 the Court denied Plaintiff's Motion to Remand;

6. On April 28, 2017 the parties held their Initial FRCP 26 Conference and submitted a proposed Discovery Scheduling Order;

7. The proposed Discovery Plan was approved by the Court on May 1, 2017;

8. On May 25, 2017 Plaintiff served written interrogatories and Requests for Production on Defendant;

9. On June 13, 2017 the parties filed a Stipulation to extend the discovery deadlines which was granted by the Court on June 15th, 2017;

10. On June 20th, 2017 Defendant filed its Motion for Protective Order regarding Depositions of Defendant noticed by Plaintiff;

11. One June 22nd, 2017 this Court set a briefing schedule and hearing date on said Motion for Protective Order with the Plaintiff's Opposition being due by June 28, 2017 and the hearing set for June 29, 2017.

A. CURRENT SCHEDULE

1. At the current time, Defendant's response to Plaintiff's written interrogatories and Requests for Production on Defendant are due June 28th, 2017;

2. Further, the Opposition of Plaintiff to Defendant's Motion for Protective Order (Doc. #18) would be June 28th, 2017 per this Court's Order, Doc. #19, herein.

B. REASONS WHY THE CURRENT MATTERS NOTED IN SECTION A CANNOT BE COMPLETED PRIOR TO THE EXPIRATION OF THE CURRENT DEADLINES

Defendant is diligently answering Plaintiff's written discovery, but Defendant's representative is out until next week and Defendant needs additional time to confer with its client to complete the discovery.

Additionally, Plaintiff wishes to depose at least 2 individuals from Defendant NGIC both of whom reside and work out of state. At the current time there is a dispute regarding these depositions that is the subject of a Motion for Protective Order (Doc#18, herein) which was filed June 20th, 2017. As the parties are now trying to resolve these issues without need of the Court's intervention, the parties seek additional time for the deadline for Plaintiff to file an Opposition to the Motion to see if they can accomplish such agreement. As such, the parties ask this court to vacate the currently set hearing date for June 29th, 2017 and allow Plaintiff additional time, up to

and including July 19th, 2017 to Respond to the Motion with hearing date to be reset thereafter.

C. PROPOSED PLAN FOR COMPLETING ABOVE ITEMS IN SECTION A

The parties request that the following deadlines be extended as follows:

- Deadline for Defendant to Answer Plaintiff's interrogatories and Request for Production: July 12, 2017
- Deadline for Plaintiff to file an Opposition to the Motion for Protective Order: July 19, 2017

D. THE CURRENT TRIAL DATE

No Trial date has yet been set.

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, seek agreement, and adequately prepare their respective cases for trial.

This is the first request for extension of time in regards to these matters. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

WHEREFORE, the parties respectfully request that this Court extend the discovery period for Defendant to Answer written discovery up to and including July 12, 2017 and extend the deadline for Plaintiff to file an Opposition to the Motion for Protective Order (Doc#18, herein), up to and including July 19, 2017 and for the hearing on the Motion for Protective Order to be re-set to a date thereafter.

DATED this _23rd __day of June, 2017

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DATED this 26th day of June, 2016.

IT IS SO ORDERED.

GEORGE W. FOLEY
United States Magistrate Judge

Conway v NGIC; CASE NO.: 2:17-cv-00748- JCM-GWF