

1 Mark Ankcorn  
2 California Bar No. 166871  
3 Admitted Pro Hac Vice  
4 Ann Marie Hansen  
5 Nevada Bar No. 10144  
6 ANKCORN LAW FIRM, PC  
7 1060 Woodcock Road, Suite 128  
8 Orlando, Florida  
9 Phone: (321) 422-2333  
10 Fax: (619) 684-3541  
11 *mark@ankcornlaw.com*  
12 *annmarie@ankcornlaw.com*

13 Attorneys for Plaintiff

14 Michael Kind, Esq.  
15 Nevada Bar No. 13903  
16 KAZEROUNI LAW GROUP, APC  
17 7854 West Sahara Avenue  
18 Las Vegas, Nevada 89117  
19 Phone: (800) 400-6808 ext. 7  
20 Fax: (800) 520-5523

21 Local Counsel for Plaintiff

22 **UNITED STATES DISTRICT COURT**  
23 **DISTRICT OF NEVADA**

24 Jewell Bates Brown, an individual,

25 Plaintiff,

26 v.

27 Credit One Bank, N.A.,

28 Defendant.

Case No. 2:17-cv-00786-JAD-VCF

**STIPULATION AND ORDER  
TO EXTEND DISCOVERY  
DEADLINES (FIRST  
REQUEST)**

29 Credit One Bank, N.A. ("Credit One") and Jewell Bates Brown ("Plaintiff") request  
30 that the Court extend the current discovery deadlines in this case by 180 days.

1                   **Discovery Completed To Date:**

2                   Plaintiff served written discovery requests on Credit One on August 8, 2017. Credit  
3                   One responded on September 13, 2017. Plaintiff seeks further responses, but Credit  
4                   One has objected to further responses pending the Court's ruling on the Motion to  
5                   Compel Arbitration [Dkt. 23] and Motion to Dismiss or Stay [Dkt 24 and 25] that Credit  
6                   One filed on September 11, 2017. Said motions are fully briefed.

7                   **Discovery that Remains To Be Completed:**

8                   Plaintiff intends to file a motion to compel substantive responses to the written  
9                   discovery requests. Plaintiff also plans to conduct the 30(b)(6) deposition of Credit One  
10                  after obtaining substantive responses to the written discovery. And, Plaintiff intends to  
11                  disclose an expert.  
12

13                  Subject to the Court's ruling on the pending motions, Credit One may serve written  
14                  discovery, take relevant depositions, and disclose a rebuttal expert.

15                  **Reason Why Discovery Not Completed:**

16                  Credit One has objected to proceeding further in discovery until there is a ruling on  
17                  the pending Motion to Compel Arbitration and Motion to Dismiss or Stay. In the  
18                  meantime, Credit One has responded to relevant written discovery requests as a  
19                  measure of good faith and produced relevant documents pertaining to the pending  
20                  motions. As mentioned previously, Plaintiff intends to file a motion to compel further  
21                  discovery responses. In addition, Plaintiff's counsel, Mr. Ankcorn, is experiencing  
22                  severe medical issues with his immediate family right now that are very time  
23                  consuming. Accordingly, good cause exists to extend the current discovery deadlines for  
24                  180 days.  
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**Proposed Schedule for Completing Discovery:**


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- a. **Discovery Cut-Off Date: October 4, 2018**
  - b. **Expert Report Deadline: August 6, 2018**
  - c. **Rebuttal Expert Report Deadline: September 7, 2018**
  - d. **Deadline for Amending Pleadings/Adding Additional Parties:  
July 5, 2018**
  - e. **Dispositive Motion Deadline: November 5, 2018**
  - f. **Interim Status Report: August 2, 2018**
  - g. **Joint Pre-trial Order: December 4, 2018**, or in the event that a summary judgment or adjudication motion is filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the summary judgment or adjudication motion or until further order of the court.
  - h. **Pretrial Disclosures:** The disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

19 IT IS SO STIPULATED.

20 Dated: January 17, 2018 */s/ Ann Marie Hansen*  
21 Attorney for Plaintiff

22  
23 Dated: January 17, 2018 */s/ Tuan Uong*  
24 Attorney for Defendant

25 IT IS SO ORDERED.

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27 \_\_\_\_\_  
United States Magistrate Judge

28 Dated: 1-23-2018