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 10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 OLGA McDOWELL, individually,
 13
 Plaintiff,
 14
 v.
 15
 GOVERNMENT EMPLOYEES
 16 INSURANCE COMPANY; DOES I - X; and
 ROE CORPORATIONS I - X, inclusive,
 17
 Defendants.
 18

Case No. 2:17-cv-00864-APG-PAL
**STIPULATION TO CONTINUE
 DISCOVERY DEADLINE DATES
 (SECOND REQUEST)**

19
 20 IT IS HEREBY STIPULATED AND AGREED between the parties to extend the discovery
 21 deadline of December 26, 2017; the initial expert disclosure deadline of October 27, 2017; the rebuttal
 22 expert disclosure deadline of November 27, 2017; the dispositive motion deadline of January 25,
 23 2018; and the Pre-Trial Order deadline of February 26, 2018. In accordance with Local Rule 26-4, the
 24 parties state as follows:

25 (a) DISCOVERY COMPLETED BY THE PARTIES

26 The completed discovery is as follows: Both parties have completed initial Rule 26
 27 Disclosures. Plaintiff has propounded a first set of interrogatories, first set of request for admissions
 28 and first set of request for production of documents. Defendant has propounded a first set of

1 interrogatories, first set of request for admissions and first set of request for production of documents.
2 Plaintiff's deposition went forward on August 25, 2017. Plaintiff has disclosed all treating physicians
3 as non-retained expert witnesses. Defendant has disclosed Dr. Joseph Schifini and Dr. Hugh Selznick
4 as defense experts.

5 (b) DISCOVERY WHICH REMAINS TO BE COMPLETED:

6 Plaintiff seeks to schedule a deposition of a Rule 30(b)(6) witness on behalf of the Defendant.
7 Further, both parties may need to retain claims handling experts and Plaintiff seeks to depose two or
8 three additional claims handlers with the Defendant, all of whom are located out of state. Herein lies
9 the impetus behind the parties request for additional time. Defendant filed several dispositive
10 motions, as follows: Motion to Dismiss, or in the alternative to Sever/Bifurcate and Stay Extra-
11 contractual claims (Doc. 7), Motion to Stay Claims for Bad Faith (Doc. 8), and Motion to Strike the
12 Allegations of the Complaint Regarding the Medical Examination of Dr. Schifini (Doc. 9). The Court
13 recently ruled upon those motions (Doc. 35), the outcome being that substantial extra-contractual
14 discovery is now going to occur. Further, Defendant will supplement prior discovery responses in
15 light of the ruling as well. Therefore, the parties request an additional ninety (90) days extension so
16 that they can obtain a ruling from the Court on these Motions, which will provide guidance on what, if
17 any, extra-contractual discovery will be necessary.

18 (c) REASONS WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN
19 THE TIME LIMIT SET BY THE DISCOVERY PLAN:

20 The Court only recently heard and decided upon GEICO's Motion to Dismiss, or in the
21 Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith. (Doc. 35). In light of the Court's
22 ruling, Plaintiff seeks to depose several GEICO pre-litigation claims handlers and potentially
23 GEICO's Rule 30(b)(6) witness(es) as well. In addition, both parties may require retention of claims
24 handling or other experts to opine on the extra-contractual claims. The parties therefore request a
25 brief ninety (90) day continuance of the deadlines in this matter in order to conduct the remaining
26 depositions and expert discovery.

27 (d) THE CURRENT SCHEDULE FOR COMPLETION OF ALL REMAINING
28 DISCOVERY:

1 The parties request that all pertinent discovery deadlines set forth in the court's Scheduling
2 Order be continued ninety (90) days, as follows: Close of discovery on March 26, 2018; initial expert
3 disclosure deadline on December 26, 2017; rebuttal expert disclosure deadline on January 25, 2018;
4 the dispositive motion deadline of April 25, 2018; and the Pre-Trial Order deadline of May 29, 2018.

5 DATED this 17th day of October, 2017

6 GLEN LERNER INJURY ATTORNEYS

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14 Olga McDowell

15 DATED this 17th day of October, 2017

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IT IS SO ORDERED this 14th day
of November, 2017.



Peggy A. Leen
United States Magistrate Judge