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Attorney for Plaintiffs Sean Kennedy, Andrew Snider, Christopher Ward,
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEAN KENNEDY, an individual; ANDREW SNIDER, an individual, CHRISTOPHER WARD, an individual; RANDALL WESTON, an individual; and RONALD WILLIAMSON, an individual;

Plaintiffs,

vs.

LAS VEGAS SANDS CORP., a Domestic Corporation; SANDS AVIATION, LLC, a Domestic Limited-Liability Company;

Defendants.

CASE NO.: 2:17-cv-00880-JCM-VCF

STIPULATION AND ORDER TO
EXTEND PRETRIAL ORDER
DEADLINE AND RELATED DEADLINES

(Fourth Request)

Pursuant to LR IA 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the current deadline to file the Joint Pretrial Order in the above-captioned case by seventy-nine (79) calendar days, up to and including June 4, 2020. This Stipulation is the fourth request to extend the joint Pretrial Order deadline in this case.

The good cause reasons for the requested extension are as follows:

(1) the parties' counsel exchanged their proposed exhibit list on January 6, 2019. Both parties exchanged lists that contained tens of thousands of exhibits. Thereafter, the parties submitted a third (3rd) stipulation to extend the trial deadlines because more time was needed for the parties to voluntarily remove exhibits and respond to the same.

(2) The parties' counsel exchanged revised exhibit lists on February 19, 2020. Though the original batch of exhibits has been reduced, there are still tens of thousands of pages of exhibits that

1 can be reduced if the parties have more time to do so. Counsel for all parties have conducted
2 several lengthy telephone conferences in an effort to reduce the total amount of pages and exhibits
3 to be introduced at trial. After several telephone conferences, the parties have agreed that further
4 reductions are warranted. The parties' counsel have dedicated numerous individuals to the arduous
5 task of reducing and organizing the tens of thousands of documents produced in discovery to a
6 more manageable number for trial.

7 (3) The parties need more time to voluntarily organize, cull, and/or perhaps remove exhibits
8 from their respective lists, to consider stipulations, if any, and to make determinations as to
9 objections for those that remain; and

10 (4) The parties requested the extension of 79 days because counsel for the parties want to
11 ensure that they have sufficient availability to review documents and information necessary for the
12 Joint Pretrial Order consistent with existing trial and other scheduling commitments.

13 In support of this Stipulation, the parties have been working together in good faith and have
14 agreed on the following internal deadlines related to the Joint Pretrial Order:

- 15 1) The parties are to re-disclose proposed exhibits on April 20, 2020.
- 16 2) The parties are to serve objections to proposed exhibits on May 13, 2020.
- 17 3) The parties will exchange language to be incorporated into the Joint Pretrial Order on
18 May 21, 2020.
- 19 4) The parties will conduct a telephone conference on May 28, 2020 to discuss final
20 language to be incorporated into the Pretrial Order and any remaining issues. Should the parties not
21 agree on the final language in the Pretrial Order, the parties have agreed to file individual Pretrial
22 Orders.
- 23 5) The parties agree to identify potential deposition transcript designations of unavailable
24 witnesses, parties and 30(b)(6) witnesses sixty (60) days before trial.
- 25 6) The parties will file the Pretrial Order by June 4, 2020.

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1 This extension is made in good faith and is not intended for purposes of delay.

2 **IT IS SO STIPULATED AND AGREED.**

3 DATED this 4th day of March, 2020.

DATED this 4th day of March, 2020.

4 LAGOMARSINO LAW

DLA PIPER LLP (US)

5 /s/ Andre Lagomarsino

/s/ Mary Dollarhide

6 Andre M. Lagomarsino, Esq. (#6711)
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9 Attorney for Plaintiffs Sean Kennedy,
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Mary Dollarhide, Esq. (admitted pro hac vice)
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San Diego, California 92121
Attorneys for Defendants

10 DATED this 4th day of March, 2020.

11 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

12 /s/ Molly Rezac

13 Molly Malone Rezac, Esq. (#7435)
14 50 West Liberty Street, Suite 920
15 Reno, Nevada 89501
16 Attorney for Defendants

17 **IT IS SO ORDERED.**



18 UNITED STATES MAGISTRATE JUDGE

19 3-5-2020

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