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9 *Attorneys for Defendant*
10 *American Family Mutual Insurance Company*

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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 FRED DOREMUS, individually; and
15 LINDA DOREMUS, individually,

16 Plaintiffs,

17 vs.

18 AMERICAN FAMILY MUTUAL
19 INSURANCE COMPANY, a foreign
20 entity; DOES I through X; and ROE
21 CORPORATIONS, XI through XX,
22 inclusive,

23 Defendants.

24 Case No. 2:17-CV-1034-RFB-VCF

25 **STIPULATION TO EXTEND
26 DISCOVERY DEADLINE**

27 **[FIRST REQUEST]**

28 The Parties, through their counsel, stipulate and request that this Court amend its
29 Scheduling Order [Doc. 13] to extend the deadlines for discovery for ninety (90) days.
30 This extension is based on good cause for the following reasons:

- 31 1. The current discovery deadline is December 18, 2017.
- 32 2. Counsel for the parties have been working with each other to schedule
33 depositions, but due to scheduling conflicts have been unable to schedule all necessary
34 depositions within the current discovery deadline.
- 35 3. The parties agree that the best course of action is to extend discovery, dispositive
36 motion, and pretrial order deadlines to ensure that all relevant depositions can be
37 conducted in this matter.
- 38 4. Counsel has worked with one another to ensure other pre-trial deadlines have
39 been met throughout the course of the case.

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5. With the above in mind, the Parties respectfully request to extend the following deadlines:

- Discovery Deadline from December 18, 2017 to **March 18, 2018**
- Dispositive Motions from January 17, 2018 to **April 17, 2018**
- Pretrial Order from February 16, 2018 to **May 17, 2018** (unless dispositive motions are filed, in which case the pretrial order shall be filed thirty days after the decision of the dispositive motions or further order of the Court)

6. All other deadlines set forth in the Scheduling Order will remain the same.

7. The parties have complied with the Scheduling Order and its deadlines thus far.

10 This request is therefore the Parties' first request to extend any discovery deadlines. The
11 Parties make this request in good faith.

12 8. For above reasons, the Parties submit that good cause exists to extend discovery,
13 dispositive motions, and pretrial order, all in accordance with the accompanying Order.

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DATED this 29th day of November, 2017.

GRAIF BARRETT & MATURA, P.C.

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By: /s/ Kevin C. Barrett

Kevin C. Barrett

Attorneys for Defendant

*American Family Mutual Insurance
Company*

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HENNESS & HAIGHT

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By: /s/ Jacob S. Smith

Mark G. Henness, Esq.

Jacob S. Smith, Esq.

Attorneys for Plaintiffs Fred and Linda Doremus

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IT IS SO ORDERED

IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE
DATED: 12-4-2017

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2017, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and that a copy of same was deposited for mailing, first class mail, postage prepaid, to the following:

Mark G. Henness, Esq.
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Attorneys for Plaintiffs

/s/ Reanna R. Diehl