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8 **UNITED STATES DISTRICT COURT**
 9
 10 **DISTRICT OF NEVADA**

11 PAMELA GROGAN, individually,
 12
 Plaintiffs,
 13 vs.
 14 STATE FARM MUTUAL AUTOMOBILE
 INSURANCE COMPANY, an entity licensed
 15 to do business in Nevada; DOES I through X;
 and ROE CORPORATIONS, XI through XX,
 16 inclusive,
 17
 Defendants.

Case No.: 2:17-cv-01044-APG-VCF

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES**
(First Request)

19 COMES NOW, Plaintiff, PAMELA GROGAN, by and through her counsel of record,
 20 MARK G. HENNESS, ESQ. and JACOB S. SMITH, ESQ. of the law firm of HENNESS &
 21 HAIGHT and Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,
 22 by and through its counsel of record, BENJAMIN J. CARMAN, ESQ. of the law firm of RANALLI
 23 ZANIEL FOWLER & MORAN, and submit the following stipulation and order to extend discovery
 24 deadlines pursuant to LR 26-4 as follows:
 25

26 **1. Summary of Discovery Completed**

27 All parties have provided initial witness lists and documents pursuant to FRCP 26 and
 28 supplements thereto. Plaintiff has executed authorizations served by Defendant. Plaintiff is

1 presently working to schedule the depositions of State Farm Adjuster, Kim Korich, as well as the
2 30(b)(6) witness(es) of State Farm. The parties are working to schedule the deposition of Plaintiff.

3
4 **2. Discovery Remaining**

5 The depositions of Plaintiff and Plaintiff's treating doctors must be completed. Written
6 discovery may be propounded by both parties. Depositions of non-party witnesses and the parties'
7 expert witnesses (once disclosed) need to be taken.

8 **3. Reason Why Discovery Was Not Completed**

9 Discovery in this matter is currently scheduled to close on April 13, 2018. Additional time
10 is required to work through scheduling issues so that discovery may be completed. The parties have
11 required additional time in order to coordinate the depositions of the Defendant's employees and
12 corporate representatives. This is the parties' first request for an extension of discovery deadlines in
13 this matter; therefore, the parties have agreed to an extension of the discovery deadlines to enable
14 them to complete the remaining discovery.
15

16 **4. Proposed Schedule for Completing Discovery**

17 Accordingly, the parties respectfully request that this Court enter an order setting the
18 following discovery plan and scheduling order dates:
19

20

Event	Former Deadline	New Deadline
Discovery Deadline	04/13/18	06/13/18
Motions to Amend Pleadings and Add Parties	01/12/18	03/12/18
Initial Expert Designations	02/12/18	04/12/18
Rebuttal Expert Designations	03/14/18	05/14/18
Dispositive Motions	05/14/18	07/13/18
Joint Pre-Trial Order	06/13/18	08/13/18

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If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

1 Counsel further states that the requested extension of the discovery deadline is not intended
2 for purposes of delay, but rather for the purposes set forth hereinabove.

3 Dated this 12th day of February, 2018.

Dated this 12th day of February, 2018.

4 HENNESS & HAIGHT

RANALLI ZANIEL FOWLER & MORAN,
5 LLC

6
7 /s/ JACOB S. SMITH, ESQ.

/s/ BENJAMIN J. CARMAN, ESQ.

8 MARK G. HENNESS, ESQ.

GEORGE M. RANALLI, ESQ.

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Henderson, Nevada 89052

Attorney for Plaintiff

Attorneys for Defendant

12
13 **ORDER**

14 13th

15 IT IS SO ORDERED this ____ day of February, 2018.

16
17 
18 _____
UNITED STATES MAGISTRATE JUDGE

19 Respectfully submitted by:

20 HENNESS & HAIGHT

21
22 /S/ JACOB S. SMITH, ESQ.

23 MARK G. HENNESS, ESQ.

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27 *Attorney for Plaintiff*