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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 PAMELA GROGAN, individually,

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

16 Plaintiffs,
17 vs.

18 STATE FARM MUTUAL AUTOMOBILE
19 INSURANCE COMPANY, an entity licensed
20 to do business in Nevada; DOES I through X;
21 and ROE CORPORATIONS, XI through XX,
22 inclusive,

23 Defendants.

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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 **4. Proposed Schedule for Completing Discovery**

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

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

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.

4 HENNESS & HAIGHT

7 /s/ JACOB S. SMITH, ESQ.
8 MARK G. HENNESS, ESQ.
9 Nevada Bar No. 5842
10 JACOB S. SMITH, ESQ.
11 Nevada Bar No. 10231
12 8972 Spanish Ridge Avenue
13 Las Vegas, Nevada 89148
14 *Attorney for Plaintiff*

Dated this 12th day of February, 2018.

RANALLI ZANIEL FOWLER & MORAN,
LLC

7 /s/ BENJAMIN J. CARMAN, ESQ.
8 GEORGE M. RANALLI, ESQ.
9 Nevada Bar No. 5748
10 BENJAMIN J. CARMAN, ESQ.
11 Nevada Bar No. 12565
12 2400 West Horizon Ridge Parkway
13 Henderson, Nevada 89052
14 *Attorneys for Defendant*

15 **ORDER**

16 13th

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

18 
19 UNITED STATES MAGISTRATE JUDGE

20 Respectfully submitted by:

21 HENNESS & HAIGHT

22 /S/ JACOB S. SMITH, ESQ.
23 MARK G. HENNESS, ESQ.
24 Nevada Bar No. 5842
25 JACOB S. SMITH, ESQ.
26 Nevada Bar No. 10231
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Attorney for Plaintiff