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8 Services Group, Inc., and Sentinel Insurance
Company, Ltd.

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

11 LV DIAGNOSTICS, LLC, a Nevada limited
12 liability company,

13 Plaintiff,

14 v.

15 THE HARTFORD FINANCIAL SERVICES
GROUP, INC., a Connecticut corporation;
16 SENTINEL INSURANCE COMPANY, LTD., a
Connecticut corporation; DOES I through X,
17 inclusive; and ROE CORPORATIONS I through
X, inclusive,

18 Defendants.

Case No.: 2:17-cv-01371-JCM-PAL

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

(THIRD REQUEST)

19
20 Defendants Hartford Financial Services Group, Inc. (**Hartford**), and Sentinel Insurance
21 Company, Ltd. (**Sentinel**) (collectively **Defendants**), and plaintiff LV Diagnostics, LLC (**Plaintiff**),
22 respectfully submit the following stipulation requesting a thirty (30) day extension of the current
23 scheduling order deadlines.

24 **I. INTRODUCTION.**

25 This case is a dispute arising out of an insurance policy covering the building and business
26 personal property at Plaintiff's location at 600 S. Martin Luther King Boulevard, in Las Vegas, NV.
27 Plaintiff allegedly suffered loss as a result of a break-in on April 8, 2015, and made a claim on its
28 insurance policy. Plaintiff filed a complaint in State Court on April 7, 2017, alleging breach of

1 contract, breach of the covenant of good faith and fair dealing, bad faith, and unfair trade practices.
2 On May 15, 2017, Defendants removed this matter to Federal Court. A discovery plan and
3 scheduling order was entered on July 14, 2017 [ECF Docket #17]. An order to extend discovery
4 deadlines was entered on November 14, 2017 [ECF Docket # 23]. A second order to extend
5 discovery deadlines was entered on January 17, 2018 [ECF Docket # 26].

6 **II. DISCOVERY STATUS.**

7 On January 17, 2018, the court entered an order to extend discovery deadlines which
8 set the following deadlines:

- 9 (a). Discovery Cut Off: Tuesday, May 29, 2018.
- 10 (b). Motions to amend pleadings or add parties: No extension requested.
- 11 (c). Initial Expert Disclosures: Friday, March 30, 2018.
- 12 (d). Rebuttal Expert Disclosures: Tuesday, May 1, 2018.
- 13 (e). Interim Status Report: Friday, March 30, 2018.
- 14 (f). Dispositive Motions: Friday, June 29, 2018.
- 15 (g). Pretrial Order: Monday, July 30, 2018.
- 16 (h). Extensions or Modifications of the Discovery Plan and Scheduling Order:
17 Monday, May 7, 2018.

18 A. Discovery that has been completed.

- 19 1. Defendants served their initial disclosures on October 10, 2017.
- 20 2. Plaintiff served its initial disclosures on October 2, 2017. The certificate of
21 service indicates that they were mailed earlier, but they were not received.
22 After correspondence, they were submitted.
- 23 3. Defendants served their first set of requests for production of documents and
24 first set of interrogatories to Plaintiff on October 10, 2017.
- 25 4. Defendants served their first supplement to initial disclosures on October 10,
26 2017.
- 27 5. Plaintiff served its supplemental disclosures on November 28, 2017.
- 28 6. The deposition of Edgar Manukyan occurred on December 8, 2017.

1 7. Plaintiff served its responses to defendant's first set of interrogatories on
2 January 31, 2018.

3 8. Plaintiff served its responses to defendants first set of requests for production
4 of documents on February 23, 2018.

5 9. Defendants served their second supplement to initial disclosures on March 12,
6 2018.

7 **B. Discovery that Remains.**

8 1. Expert disclosures;

9 2. Deposition of Expert Witnesses;

10 3. Follow up on Written Discovery;

11 4. Plaintiff's continued deposition (and follow up discovery on any new issues
12 that arise at the deposition)

13 The parties reserve the right to take additional discovery during the time frames outlined
14 below should the need arise.

15 **III. REASON WHY EXTENSION IS REQUIRED.**

16 The parties recently held a meet and confer regarding the Plaintiffs' responses to written
17 discovery, and are requesting an additional thirty (30) days of discovery in order for plaintiff to
18 continue to gather necessary documents and to supplement their responses, and for Defendant to
19 review and conduct any necessary follow up discovery in responses to the documents. As the
20 supplemental responses and documents may have an impact on the need for and extent of expert
21 disclosures, the parties request that the discovery deadline for expert disclosures also be extended.

22 **V. PROPOSED SCHEDULE.**

23 (a). Discovery Cut Off: **Thursday, June 28, 2018.**

24 (b). Motions to amend pleadings or add parties: **No extension requested.**

25 (c). Initial Expert Disclosures: **Monday, April 30, 2018 (deadline falls on a**
26 **Sunday).**

27 (d). Rebuttal Expert Disclosures: **Thursday, May 31, 2018.**

28 (e). Interim Status Report: **No extension requested.**

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- (f). Dispositive Motions: **Monday, July 30, 2018 (deadlines falls on a Sunday).**
- (g). Pretrial Order: **Wednesday, August 29, 2018.**
- (h). Extensions or Modifications of the Discovery Plan and Scheduling Order:
Wednesday, June 6, 2018.

The parties believe that the thirty (30) day extension of the discovery deadlines are necessary and appropriate to provide sufficient time for plaintiff to finish gathering the requested documents and supplementing their discovery responses, and to allow defendant sufficient time to review and conduct any necessary follow-up on the discovery produced.

DATED this 3rd day of April, 2018.

<p>AKERMAN LLP</p> <p><u>/s/ Jamie K. Combs</u> DARREN BRENNER, ESQ. Nevada Bar No. 8276 JAMIE K. COMBS, ESQ. Nevada Bar No. 13088 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134</p> <p>Attorneys for Hartford Financial Services Group, Inc., and Sentinel Insurance Company, Ltd.</p>	<p>ROGER P. CROTEAU & ASSOCIATES, LTD.</p> <p><u>/s/ Robert W. Linder</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 ROBERT W. LINDER, ESQ. Nevada Bar No. 3661 9120 W. Post Road, Suite 100 Las Vegas, NV 89148</p> <p>Attorneys for LV Diagnostics, LLC</p>
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IT IS SO ORDERED.

IT IS FURTHER ORDERED that no further extensions will be granted.


UNITED STATES MAGISTRATE JUDGE

DATED: April 6, 2018