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7 Attorneys for Defendant  
 8 Wal-Mart Stores, Inc.

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

Case No.: 2:17-cv-01372-RFB-PAL

11 DONNA LINARDO,  
 12

Plaintiff,

v.

14 WAL-MART STORES, INC., READDY ICE  
 15 CORPORATION; DOES I -X, inclusive; and  
 ROE CORPORATIONS I - X, inclusive,  
 16

Defendants.

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DATE FOR FILING  
 JOINT PRETRIAL ORDER (SECOND  
 REQUEST)**

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 18 WHEREAS, pursuant to the order of this Court (Doc. #56), the parties were to file a Joint Pretrial  
 19 Order on or before April 13, 2018; and

20 WHEREAS, on March 13, 2018, the Court Defendant Walmart to produced: (1) Each retained  
 21 experts' invoices within the last four years and proof of payment; and (2) deposition testimony for  
 22 each expert within the last four years for all Walmart cases handled by Phillips, Spallas, & Angstadt,  
 23 LLC, which Walmart or its expert has in their possession. Based on the voluminous amount of  
 24 documents produced by Defendant Walmart, Plaintiff's counsel is in the process of reviewing the  
 25 same for utilization in the pre trial order. Plaintiff's counsel has also advised Plaintiff continues to  
 26 undergo psychiatric treatment in support of her allegations of pain and suffering that Plaintiff's  
 27 counsel would like to utilize in preparation of the Pretrial Order. Lastly, the parties are continuing  
 28

1 informal settlement negotiations in an attempt to engage in a resolution prior to any significant pre-  
2 trial preparation.;

3 IT IS HEREBY STIPULATED AND AGREED by and between Betsy C. Jefferis, Esq. of the law  
4 firm of PHILLIPS, SPALLAS & ANGSTADT LLC, Attorneys for Defendant Wal-Mart Stores, Inc.  
5 and Douglas M. Cohen, Esq. of WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP,  
6 Attorneys for Plaintiff Donna Linardo, as follows:

7 That the deadline for filing the Joint Pretrial Order be extended to July 13, 2018.

8  
9 DATED this 22nd day of March, 2018.

DATED this 22nd day of March, 2018.

10 /s/ Doug Cohen

/s/ Betsy Jefferis

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12 DOUG COHEN, ESQ.  
13 Nevada Bar No. 1214  
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16 Attorneys for Plaintiff  
Donna Linardo

Attorneys for Defendant  
Wal-Mart Store, Inc.

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19 **IT IS SO ORDERED:**

20   
21 UNITED STATES MAGISTRATE JUDGE

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23 **DATED:** March 30, 2018  
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