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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAVID LEONI,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC. and MILITARY STAR,

Defendants.

Case No. 2:17-cv-01408-RFB-VCF
**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

[First Request]

Pursuant to LR 6-1 and LR 26-4, Plaintiff and Experian Information Solutions, Inc., by and through their respective counsel of record, hereby stipulate and request that this Court extend the motion to amend deadline by fifty (50) days. At this time, the parties are not seeking an extension of any other discovery deadlines but reserve the right to request in the future. In support of this Stipulation and Request, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

Presently, the active parties to this case are Plaintiff and Experian Information Solutions, Inc. (“Experian”), and as such, the recitation of discovery shall be with respect to Plaintiff and Experian.

- 1. Plaintiff filed the instant complaint on May 18, 2017.
- 2. On June 12, 2017, Experian filed its answer.

1 3. On June 23, 2017, the parties held the Rule 26 Conference.

2 4. On June 23, 2017, Plaintiff served Experian with requests for admission, requests
3 for production of documents, and interrogatories. Experian responded on July 24, 2017.

4 5. On June 23, 2017, Plaintiff served Experian with a notice of deposition, setting the
5 deposition of Experian's 30(b)(6) designee for August 1, 2017. Experian's witness is not available
6 on August 1, 2017, but is available on September 15, 2017. Plaintiff's counsel has agreed to this
7 date provided the parties stipulate to the extension of the motion to amend deadline until 50 days
8 after the renoticed deposition date and Plaintiff's deposition occurs after Experian's deposition.

9 6. On July 5, 2017, the parties submitted a proposed Discovery Plan and Scheduling
10 Order.

11 7. On July 6, 2017, the Stipulated Protective Order was entered.

12 8. On July 25, 2017, Experian served its initial disclosures.

13 9. On July 26, 2017, Plaintiff served his initial disclosures.

14 **B. Specific Description of Discovery that Remains to be Completed**

15 1. The deposition of Experian's 30(b)(6) witness, which Plaintiff has agreed to
16 renotice for September 15, 2017;

17 2. The deposition of Plaintiff, which Experian has agreed to renotice for a date after
18 Experian's rescheduled deposition;

19 3. Depositions of remaining parties and witnesses; and,

20 4. Any necessary additional written discovery.

21 **C. Reasons Why the Remaining Discovery Was Not Completed**

22 The parties aver, pursuant to LR 6-1, that good cause exists for the requested extension.
23 At this juncture, the discovery close is December 11, 2017.¹ This stipulation to extend the
24 discovery deadlines is made well in advance of the applicable discovery deadlines and is made to
25 accommodate the availability of Experian's 30(b)(6) designee on September 15, 2017, and
26

27 ¹ This is based on the Proposed Discovery Plan (ECF No. 7), which stands submitted to the
28 Court.

1 Plaintiff's request, and the parties' agreement, to extend the motion to amend pleadings deadline
2 such that the motion to amend pleadings deadline will now be approximately fifty (50) days after
3 Experian's rescheduled deposition, or November 6, 2017. At this time, the parties do not request
4 an extension of any other discovery deadlines, but only an extension of the motion to amend
5 deadline. The parties reserve the right to seek an extension of other deadlines in the future.

6 **D. Proposed Discovery Deadlines**

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<u>Event</u>	<u>Current Deadline²</u>	<u>Proposed New Deadline</u>
Close of Discovery	December 11, 2017	Same
Deadline to Amend Pleadings	September 11, 2017	November 6, 2017
Deadline to Disclose Initial Experts	October 10, 2017	Same
Deadline to Disclose Rebuttal Experts	November 9, 2017	Same

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² See n. 1.

Dispositive Motions	January 8, 2018	Same
Pre-Trial Order	February 7, 2018	Same

Dated: July 27, 2017

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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.

ORDER

IT IS SO ORDERED.

Dated: July 28, 2017, _____



 UNITED STATES MAGISTRATE JUDGE