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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HERA POLANGCUS,
Plaintiff,
v.
EXPERIAN INFORMATION SOLUTIONS,
INC,
Defendants.

Case No. 2:17-cv-01477-JAD-CWH

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

[First Request]

Pursuant to LR 6-1 and LR 26-4, Plaintiff and Experian Information Solutions, Inc. (“Experian”), 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

1. Plaintiff filed the instant complaint on May 24, 2017.
2. On June 15, 2017, Experian filed its answer.
3. On June 29, 2017, Plaintiff and Experian held the Rule 26 conference.
4. On June 29, 2017, Plaintiff served Experian with requests for admission, requests for production of documents, and interrogatories, which Experian responded to on July 31, 2017.

1 5. On June 29, 2017, Plaintiff served Experian with a notice of deposition, setting the
2 deposition of Experian's 30(b)(6) designee for August 9, 2017. Experian's witness is not available
3 on August 9, 2017, but is available on September 12, 2017. Plaintiff's counsel has agreed to this
4 date provided the parties stipulate to the extension of the motion to amend deadline until 50 days
5 after the renoticed deposition date and Plaintiff's deposition occurs after Experian's deposition.

6 6. On July 7, 2017, the Discovery Plan and Scheduling Order was entered.

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

8 8. On July 13, 2017, Experian served its initial disclosures.

9 9. On July 14, 2017, Plaintiff served her initial disclosures.

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

11 1. The deposition of Experian's 30(b)(6) witness, which Plaintiff has agreed to
12 renotece for September 12, 2017;

13 2. The deposition of Plaintiff, which Experian has agreed to renotece for a date after
14 Experian's rescheduled deposition;

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

16 4. Any necessary additional written discovery.

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

18 The parties aver, pursuant to LR 6-1, that good cause exists for the requested extension.
19 At this juncture, the discovery close is December 12, 2017. This stipulation to extend the discovery
20 deadlines is made well in advance of the applicable discovery deadlines and is made to
21 accommodate the availability of Experian's 30(b)(6) designee on September 12, 2017, and
22 Plaintiff's request, and the parties' agreement, to extend the motion to amend pleadings deadline
23 such that the motion to amend pleadings deadline will now be approximately fifty (50) days after
24 Experian's rescheduled deposition, or November 1, 2017. At this time, the parties do not request
25 an extension of any other discovery deadlines, but only an extension of the motion to amend
26 deadline. The parties reserve the right to seek an extension of other deadlines in the future.

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1 **D. Proposed Discovery Deadlines**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	December 12, 2017	Same
Deadline to Amend Pleadings	September 13, 2017	November 1, 2017
Deadline to Disclose Initial Experts	October 13, 2017	Same
Deadline to Disclose Rebuttal Experts	November 13, 2017	Same
Dispositive Motions	January 11, 2018	Same
Pre-Trial Order	February 12, 2018	Same

10 Dated: August 4, 2017

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12 KNEPPER & CLARK, LLC

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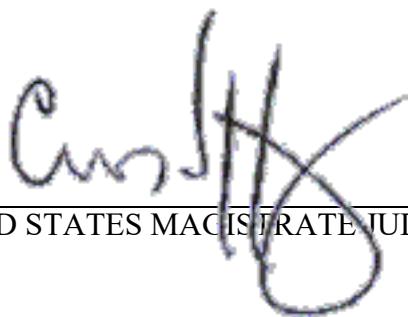
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21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated: August 7, 2017

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25 UNITED STATES MAGISTRATE JUDGE