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12 *Experian Information Solutions, Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15  
16 DRAKE COLLIER,  
17 Plaintiff,  
18 vs.  
19 EXPERIAN INFORMATION SOLUTIONS,  
20 INC. and TRANS UNION, LLC,  
21 Defendants.  
22  
23

24 Case No. 2:17-cv-01486-APG-PAL

25 **STIPULATION AND ORDER TO EXTEND  
26 DISCOVERY DEADLINES**

27 **[First Request]**

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

29 **I. DISCOVERY COMPLETED TO DATE**

30  
31 1. Plaintiff filed the instant complaint on May 25, 2017.  
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33 2. On June 21, 2017, Experian filed its answer.  
34  
35 3. On June 29, 2017, Plaintiff and Experian held the Rule 26 conference.  
36  
37 4. On July 5, 2017, Trans Union filed its answer.  
38

1           5. On June 29, 2017, Plaintiff served Experian with requests for admission, requests  
 2 for production of documents, and interrogatories.

3           6. On June 23, 2017, Plaintiff served Experian with a notice of deposition, setting the  
 4 deposition of Experian's 30(b)(6) designee for August 8, 2017. Experian's witness is not available  
 5 on August 8, 2017, but is available on September 20, 2017. Plaintiff's counsel has agreed to this  
 6 date provided the parties stipulate to the extension of the motion to amend deadline until 50 days  
 7 after the renoted deposition date and Plaintiff's deposition occurs after Experian's deposition.

8           7. On July 13, 2017, the Discovery Plan and Scheduling Order was entered.

9           8. On July 18, 2017, the Stipulated Protective Order was entered.

10          9. On July 13, 2017, Trans Union and Experian served their initial disclosures.

11          10. On July 14, 2017, Plaintiff served his initial disclosures.

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

13          1. The deposition of Experian's 30(b)(6) witness, which Plaintiff has agreed to  
 14 renote for September 20, 2017;

15          2. The deposition of Plaintiff, which Experian has agreed to renote for a date after  
 16 Experian's rescheduled deposition;

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

18          4. Any necessary additional written discovery.

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

20          The parties aver, pursuant to LR 6-1, that good cause exists for the requested extension.  
 21 At this juncture, the discovery close is December 18, 2017. This stipulation to extend the discovery  
 22 deadlines is made well in advance of the applicable discovery deadlines and is made to  
 23 accommodate the availability of Experian's 30(b)(6) designee on September 20, 2017, and  
 24 Plaintiff's request, and the parties' agreement, to extend the motion to amend pleadings deadline  
 25 such that the motion to amend pleadings deadline will now be approximately fifty (50) days after  
 26 Experian's rescheduled deposition, or November 9, 2017. At this time, the parties do not request  
 27 an extension of any other discovery deadlines, but only an extension of the motion to amend  
 28

1 deadline. The parties reserve the right to seek an extension of other deadlines in the future.

2 **D. Proposed Discovery Deadlines**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	December 18, 2017	Same
Deadline to Amend Pleadings	September 19, 2017	November 9, 2017
Deadline to Disclose Initial Experts	October 19, 2017	Same
Deadline to Disclose Rebuttal Experts	November 20, 2017	Same

1	Dispositive Motions	January 18, 2018	Same
2	Pre-Trial Order	February 19, 2018	Same

3 Dated: August 3, 2017

4 NAYLOR & BRASTER

KNEPPER & CLARK, LLC

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16 *Attorneys for Defendant Trans Union LLC*

17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated: August 7, 2017

20   
21 UNITED STATES MAGISTRATE JUDGE