

1 Jennifer L. Braster
 Nevada Bar No. 9982
 2 Andrew J. Sharples
 Nevada Bar No. 12866
 NAYLOR & BRASTER
 3 1050 Indigo Drive, Suite 200
 Las Vegas, NV 89145
 4 (T) (702) 420-7000
 (F) (702) 420-7001
 5 jbraster@naylorandbrasterlaw.com
 asharples@naylorandbrasterlaw.com
 6

7 *Attorneys for Defendant*
Experian Information Solutions, Inc.

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

11 DRAKE COLLIER,

12 Plaintiff,

13 vs.

14 EXPERIAN INFORMATION SOLUTIONS,
 INC. and TRANS UNION, LLC,

15 Defendants.
 16

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

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY DEADLINES**

[First Request]

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

23 **I. DISCOVERY COMPLETED TO DATE**

- 24 1. Plaintiff filed the instant complaint on May 25, 2017.
 25 2. On June 21, 2017, Experian filed its answer.
 26 3. On June 29, 2017, Plaintiff and Experian held the Rule 26 conference.
 27 4. On July 5, 2017, Trans Union filed its answer.
 28

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 renoticed 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 renotice for September 20, 2017;

15 2. The deposition of Plaintiff, which Experian has agreed to renotice 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**

3

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
4 Close of Discovery	December 18, 2017	Same
5 Deadline to Amend Pleadings	September 19, 2017	November 9, 2017
6 Deadline to Disclose Initial 7 Experts	October 19, 2017	Same
8 Deadline to Disclose Rebuttal 9 Experts	November 20, 2017	Same

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Dated: August 3, 2017

NAYLOR & BRASTER

KNEPPER & CLARK, LLC

By: /s/ Jennifer L. Braster
 Jennifer L. Braster
 Nevada Bar No. 9982
 1050 Indigo Drive, Suite 200
 Las Vegas, NV 89145

By: /s/ Miles N. Clark
 Matthew I. Knepper (NBN 12796)
 Miles N. Clark (NBN 13848)
 10040 W. Cheyenne Ave., Suite 170-109
 Las Vegas, NV 89129

*Attorneys for Defendant Experian
 Information Solutions, Inc.*

David H. Krieger
 Nevada Bar No. 9086
 HAINES & KRIEGER, LLC
 8985 S. Eastern Avenue, Suite 350
 Henderson, NV 89123

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Jason Revzin
 Jason G. Revzin
 Nevada Bar No. 8629
 6385 S. Rainbow Blvd., Suite 600
 Las Vegas, NV 89118

Attorneys for Plaintiff

Attorneys for Defendant Trans Union LLC

ORDER

IT IS SO ORDERED.

Dated: August 7, 2017


 UNITED STATES MAGISTRATE JUDGE