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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 _____ :
15 DOREEN FARMER, and all similarly situated :
16 individuals, :
17 : Civil Action No.: 2:17-cv-1531-RFB-PAL
18 Plaintiffs, :
19 v. : **STIPULATION AND ORDER TO
20 EXTEND DISCOVERY DEADLINES**
21 EXPERIAN INFORMATION SOLUTIONS, : **[Third Request]**
22 INC., :
23 Defendant. :
24 _____

21 Pursuant to LR 6-1 and LR 26-4, Plaintiff Doreen Farmer (“Plaintiff”) and Experian
22 Information Solutions, Inc. (“Experian”), by and through their respective counsel of record, hereby
23 stipulate and request that this Court extend all case deadlines by sixty (60) days. In support of this
24 Stipulation and Request, the parties state as follows:

25 **I. DISCOVERY COMPLETED TO DATE**

- 26 1. Plaintiff filed the instant complaint on May 31, 2017.
- 27 2. On June 28, 2017, Experian filed its answer.

1 3. On July 26, 2017, Experian propounded its deposition notice on Plaintiff, setting
2 Plaintiff's deposition for October 9, 2017.

3 4. On July 31, 2017, the parties submitted their competing plans for discovery.

4 5. On August 7, 2017, the Court granted the parties' stipulated protective order.

5 6. On August 9, 2017, Experian provided its initial disclosures.

6 7. On August 15, 2017, Plaintiff provided her initial disclosures.

7 8. On August 18, 2017, Plaintiff provided her first supplemental disclosures.

8 9. On August 31, 2017, the Court issued its scheduling order, permitting discovery on
9 both the individual and class components of Plaintiff's case to proceed simultaneously.

10 10. On September 21, 2017, Experian propounded its first set of Requests for
11 Production of Documents on Plaintiff.

12 11. On September 26, 2017, Plaintiff propounded her first set of Requests for
13 Admission, Production, and Interrogatories on Experian, setting Experian's deposition for
14 November 17, 2017.

15 12. On September 26, 2017, Plaintiff propounded her first deposition notice to
16 Experian.

17 13. On October 11, 2017, Plaintiff propounded her first amended deposition notice to
18 Experian, setting Experian's deposition for November 20, 2017.

19 14. On October 20, 2017, Plaintiff provided her responses to Experian's first set of
20 Requests for Production of Documents.

21 15. On October 20, 2017, Experian propounded its first amended notice of deposition
22 on Plaintiff, setting Plaintiff's deposition for November 14, 2017.

23 16. On October 20, 2017, Plaintiff propounded her second amended deposition notice
24 to Experian, setting Experian's deposition for December 1, 2017.

25 17. On November 3, 2017, Experian provided its responses to Plaintiff's first set of
26 Requests for Admissions, Production, and Interrogatories.

27 18. On November 7, 2017, Plaintiff sent Experian a Rule 26-7 letter regarding
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1 Experian's discovery responses.

2 19. On November 13, 2017, Plaintiff and Experian conducted a partial meet-and-confer
3 regarding Plaintiff's Rule 26-7 letter.

4 20. On November 28, 2017, Plaintiff propounded her third amended deposition notice
5 on Experian, setting Experian's deposition tentatively for December 21, 2017.

6 21. On December 5, 2017, the parties met and conferred regarding Experian's
7 responses to Plaintiff's written discovery requests.

8 22. On January 22, 2018, the parties conducted a second conference regarding
9 Experian's responses to Plaintiff's written discovery requests.

10 23. On February 1, 2018, Experian served its supplemental responses to Plaintiff's First
11 Set of Interrogatories.

12 24. On February 2, 2018, the parties conducted a third conference regarding Experian's
13 responses to Plaintiff's written discovery requests.

14 25. On March 10, 2018, Plaintiff propounded his Second Set of Requests for
15 Production on Experian.

16 26. On April 18, 2018, Experian responded to Plaintiff's Second Set of Requests for
17 Production.

18 27. On April 18, 2018, Experian sent a 26-7 letter regarding Plaintiff's Responses to
19 Experian's First Sets of Requests for Admission, Production, and Interrogatories.

20 28. On April 27, 2018, Experian propounded its Second Amended Notice of Deposition
21 on Plaintiff, setting Plaintiff's deposition for June 19, 2018.

22 29. On May 9, 2018, Experian served its first supplemental disclosures.

23 30. On May 20, 2018, Plaintiff sent a 26-7 letter regarding Experian's Responses to
24 Plaintiff's Second Set of Requests for Production, as well as a limited subset of Plaintiff's First
25 Set of Requests for Production and Interrogatories.

26 31. On June 11, 2018, the parties conferred briefly via telephone regarding Experian's
27 discovery production in this case.

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1 32. On June 19, 2018, the parties conferred briefly via telephone regarding Experian's
2 discovery production in this case.

3 33. On June 19, 2018, Plaintiff served Experian with its Fourth Amended Notice of
4 Experian's 30(b)(6) deposition.

5 34. On July 3, 2018, the parties conferred on Plaintiff's May 20, 2018 26-7 letter.

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

7 1. The potential supplementation of written discovery between the parties;

8 2. Depositions of Plaintiff and Experian;

9 3. Potential depositions of Experian's other personnel, as appropriate;

10 4. Depositions of third parties, as appropriate;

11 5. Depositions of Plaintiff's expert and Experian's rebuttal expert, if necessary;

12 6. Any additional necessary written discovery, including any follow-up meet and
13 confer to discovery that has already been propounded and/or responded to.

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

15 The parties can demonstrate good cause for the extension. This class case involves
16 calculation of large amounts of data from Experian's internal records. Plaintiff has propounded
17 written discovery requests designed to ascertain the Class and propounded a second set of requests
18 for production which seek background information regarding Experian's technical systems,
19 process of responding to written discovery, and specification of those portions of Plaintiff's class-
20 based discovery requests which are subject to automated and manual review. Plaintiff and
21 Experian have conferred on whether any limited return of this information can be provided.

22 Presently, the parties are in the process of scheduling Experian's 30(b)(6) deposition and
23 the deposition of Plaintiff. Give the potentially technical nature of the 30(b)(6) deposition, and
24 the fact that both depositions may impact the expert disclosures, the parties seek a 60-day extension
25 of all present case deadlines in order to ensure that the 30(b)(6) depositions can be completed prior
26 to the time for expert disclosures. This brief extension will also permit the parties to continue to
27 discuss whether some limited production in connection with Plaintiff's Second Set of Requests for
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1 Production can be provided prior to Experian's 30(b)(6) deposition.

2 For all of these reasons, the parties request that the Court grant this request for an extension
3 of time.

4 **D. Proposed Discovery Deadlines**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	September 25, 2018	November 26, 2018 ¹
Amend Pleadings	November 27, 2017	Same ²
Disclose Initial Experts	July 27, 2018	September 25, 2018
File Interim Status Report	July 27, 2018	September 25, 2018
Disclose Rebuttal Experts	August 27, 2018 ³	October 26, 2018
File Dispositive Motions	October 25, 2018	December 24, 2018
File Motion for Class Certification	None	December 24, 2018
Opposition to Class Certification	None	January 23, 2019
File Pre-Trial Order	November 26, 2018 (or 30 days after dispositive motions are decided) ⁴	January 23, 2019 (or 30 days after dispositive motions are decided)

14 Dated: July 5, 2018

<p>16 <u>/s/ Jennifer L. Braster</u> Jennifer L Braster, Esq. (NBN 9982) Andrew J Sharples, Esq (NBN 12866) NAYLOR & BRASTER 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145</p> <p>19 John Andrew Vogt (NBN 14777) Edward San Chang (<i>Pro Hac Vice</i>) JONES DAY 3161 Michelson Dr Ste 800 Irvine, CA 92612 <i>Attorneys for Experian Information Solutions, Inc.</i></p>	<p>16 <u>/s/ Miles N. Clark</u> Matthew I. Knepper, Esq. (NBN 12796) Miles N. Clark, Esq. (NBN 13848) KNEPPER & CLARK LLC 10040 W. Cheyenne Ave., Suite 170-109 Las Vegas, NV 89129</p> <p>20 David H. Krieger, Esq. (NBN 9086) HAINES & KRIEGER, LLC 8985 S. Eastern Ave., Suite 350 Henderson, NV 89123 <i>Attorneys for Plaintiff</i></p>
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25 ¹ November 26, 2018 is a Saturday.

26 ² While the parties could not agree to request an extension of this deadline, the parties agree
27 that Plaintiff reserves all rights to seek to reopen other case deadlines based on facts not yet
disclosed that may be revealed as discovery progresses.

28 ³ August 26, 2018 is a Sunday.

⁴ November 24, 2018 is a Saturday.

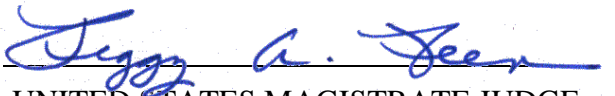
ORDER GRANTING

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

IT IS SO ORDERED.

IT IS FURTHER ORDERED that no further extensions will be allowed.

Dated: July 6, 2018


UNITED STATES MAGISTRATE JUDGE

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