

1 **GEORGE M. RANALLI, ESQ.**
 Nevada Bar No. 5748
 2 **BENJAMIN J. CARMAN, ESQ.**
 Nevada Bar No. 12565
 3 **RANALLI ZANIEL FOWLER & MORAN, LLC**
 2400 W. Horizon Ridge Parkway
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 5 Attorneys for Defendant
 CSAA General Insurance Company
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7
 8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9
 10 **KRYSTAL ROSSE, individually,**

2:17-cv-01557-JCM-VCF

11 Plaintiff,

12 v.

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY DEADLINES
 (First Request)**

13 **CSAA GENERAL INSURANCE COMPANY;**
a foreign corporation, DOES I-
X, and ROE CORPORATIONS I-X,
 14 **inclusive,**

15 Defendant
 16

17 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, KRYSTAL
 18 ROSSE, and Defendant, CSAA GENERAL INSURANCE COMPANY to Extend
 19 Discovery Deadlines by 70 days.

20 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

21 The following discovery has been completed by the parties:
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- 1 1. Defendant's Initial Disclosure, pursuant to FRCP
- 2 26(f);
- 3 2. Defendant's First Set of Requests for Admissions to
- 4 Plaintiff;
- 5 3. Defendant's First Set of Interrogatories to Plaintiff;
- 6 4. Defendant's First Set of Request for Production of
- 7 Documents to Plaintiff;
- 8 5. Defendant's Designation of Expert Witnesses and
- 9 Documents;

10 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**
11 **COMPLETED:**

- 12 1. Plaintiff to produce their initial disclosures;
- 13 2. Defendant & Plaintiff to disclosure their rebuttal
- 14 experts;
- 15 3. Depositions of the Person Most Knowledgeable from
- 16 Plaintiff's medical providers relevant to treatment
- 17 rendered to Plaintiff since the date of this accident;
- 18 4. Depositions of Plaintiff and Defendant's experts;
- 19 5. Deposition of Plaintiff;

20 **A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED**
21 **WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

22 Plaintiff's counsel has made some changes within their
23 office and has caused some delays in producing documentation and
24 scheduling. Further, the holiday months has made scheduling

1 depositions difficult for both parties and the respective
2 individuals they are trying to schedule.

3 The parties believe that a modest addition of seventy days
4 will accommodate both parties sufficiently to conclude the
5 discovery that remains in this matter.

6 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
8 Discovery Cut off:	02/23/2018	05/04/2018
9 Expert Disclosure:	12/22/2017	CLOSED
10 Rebuttal of Experts:	01/22/2018	04/04/2018
11 Interim Status Report:	03/26/2018	06/04/2018
12 Dispositive Motions:	03/26/2018	06/04/2018
13 Pre Trial Order:	04/25/2018	07/04/2018
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1 F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

3 DATED this 8th day of January, 2018.

4 RANALLI ZANIEL FOWLER & MORAN, ANTHONY PAGLIA INJURY LAWYERS
5 LLC

6 /s/ Benjamin Carman
7 GEORGE M. RANALLI, ESQ.
8 Nevada Bar No. 5748
9 BENJAMIN J. CARMAN, ESQ.
10 Nevada Bar No. 12565
11 2400 W. Horizon Ridge Parkway
12 Henderson, Nevada 89052
13 Attorneys for Defendant

6 /s/ Anthony Paglia
7 ANTHONY PAGLIA, ESQ.
8 Nevada Bar No. 11234
9 255 E. Warm Springs Road,
10 Suite 100A
11 Las Vegas, NV 89119
12 Attorney for Plaintiff,
13 Krystal Rosse

14 COHEN JOHNSON PARKER EDWARDS

15 /s/ Blair C. Parker
16 BLAIR C. PARKER, ESQ.
17 Nevada Bar No. 3222
18 JAMES L. EDWARDS, ESQ.
19 Nevada Bar No. 4256
20 255 E. Warm Springs Rd. #100
21 Las Vegas, Nevada 89119
22 Attorneys for Plaintiff

23 **ORDER**

24 IT IS SO ORDERED:

Dated: 1-9-2018



UNITED STATES MAGISTRATE JUDGE