

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  
 6

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  
 (Second 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 60 days.

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

21 The following discovery has been completed by the parties:  
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 23  
 24

RANALLI ZANIEL FOWLER & MORAN, LLC  
 2400 W. HORIZON RIDGE PARKWAY  
 HENDERSON, NEVADA 89052  
 TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

- 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 6. Defendant's First Supplemental Designation of Expert
- 11 Witnesses and Documents;
- 12 7. Plaintiff's Initial Disclosure, pursuant to FRCP
- 13 26(f);
- 14 8. Defendant's First Supplemental Disclosures, pursuant
- 15 to FRCP 26(f);
- 16 9. Defendant's Second Supplemental Disclosures, pursuant
- 17 to FRCP 26(f);
- 18 10. Plaintiff's Responses to Defendant's First Set of
- 19 Requests for Admissions;
- 20 11. Plaintiff's Responses to Defendant's First Set of
- 21 Interrogatories;
- 22 12. Plaintiff's Responses to Defendant's First Set of
- 23 Request for Production of Documents;
- 24 13. Deposition of Brian Rodems;

1 14. Deposition of Matthew Emmons;

2 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**  
3 **COMPLETED:**

4 1. Depositions of the Person Most Knowledgeable from  
5 Plaintiff's medical providers relevant to treatment  
6 rendered to Plaintiff since the date of this accident;

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

9 Defendant would like to take the depositions of Plaintiff's  
10 treating providers. Both parties are attempting to schedule the  
11 remaining depositions timely, but the parties are having  
12 difficulties accommodating all parties schedules.

13 Further, the parties have discussed a possible mediation as  
14 an option for settlement in an attempt to keep costs down. The  
15 parties are working toward arranging the mediation at this  
16 point.

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

	<b>Old Deadline</b>	<b>New Deadline</b>
18		
19	Discovery Cut off:	05/04/2018 07/03/2018
20	Expert Disclosure:	12/22/2017 CLOSED
21	Rebuttal of Experts:	04/04/2018 CLOSED
22	Interim Status Report:	06/04/2018 05/04/2018
23	Dispositive Motions:	06/04/2018 08/04/2018
24	Pre Trial Order:	07/04/2018 09/03/2018

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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 2<sup>nd</sup> day of May, 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  
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14 COHEN JOHNSON PARKER EDWARDS

15 /s/ Blair 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: May 2, 2018  
\_\_\_\_\_

UNITED STATES MAGISTRATE JUDGE