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7 Attorneys for I.C. System, Inc.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 JOHN HASTINGS,) Case No.: 2:17-CV-01588-RFB-NJK
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO**
13 I.C. SYSTEM, INC.; and DOES 1-10,) **EXTEND TIME TO FILE**
14 Defendants.) **DISCOVERY PLAN**
15) **FIRST REQUEST**
16)

17 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff John Hastings (“Plaintiff”), and Defendant
18 I.C. System, Inc. (“ICS”), by and through their respective attorneys of record, stipulate as
19 follows:
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21 **STIPULATION**

- 22 1. Plaintiff filed his Complaint on September 27, 2016 in the Northern District of
23 Illinois.
24 2. The case was subsequently transferred to the District of Nevada. ECF No. 25.
25 3. On June 8, 2017, this Court issued a Minute Order requesting the parties file a
26 discovery plan by August 4, 2017. ECF No. 27.
27 4. It appears that the Court may have mailed notice of the June 8, 2017 Minute
28 Order [ECF No. 27] to ICS’s attorneys Gordon Rees Scully Mansukhani, LLP in Illinois and

1 California, however, Gordon Rees Scully Mansukhani, LLP does not have record of having
2 received the Minute Order [ECF No. 27].

3 5. Gordon Rees Scully Mansukhani, LLP learned about the Minute Order on August
4 4, 2017 from the Plaintiff's attorneys.

5 6. Due to a calendaring error, Plaintiff's attorneys, Lemberg Law L.L.C., did not
6 realize the due date for the discovery plan was August 4, 2017 until August 4, 2017.

7 7. Due to the calendaring error, Plaintiff's attorneys were unable to provide a copy
8 of the draft discovery plan until August 4, 2017, the date on which the discovery plan is due to
9 the Court under ECF No. 27.

10 8. Plaintiff's attorneys are also preparing a pro hac vice application to allow them to
11 appear in this action. Plaintiff has secured local Nevada counsel and Plaintiff's attorneys intend
12 to file the pro hac vice application with the Court shortly.

13 9. Due to these reasons, the parties request a two week extension to file the
14 discovery plan.

15 10. The extension will allow the parties to review the draft discovery plan and more
16 fully discuss potential issues regarding document production, protective orders, etc.

17 11. Plaintiff and ICS are also currently engaged in settlement discussions to resolve
18 this case. An extension of the deadline to submit the discovery plan will allow the parties to
19 continue settlement discussions without incurring additional fees and expenses.

20 12. This is the parties' first request to continue the deadline to submit the discovery
21 plan and this request is not made for improper purposes or to delay the case.

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13. Therefore, the parties request that the deadline to submit the discovery plan be extended until **August 18, 2017**.

DATED: August 4, 2017.

GORDON REES SCULLY
MANSUKHANI, LLP

/s/ Robert S. Larsen

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DATED: August 4, 2017.

LEMBERG LAW, L.L.C

/s/ Jenny DeFrancisco

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: August 7, 2017