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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 JAVIER DEL RIVERO,) Case No.: 2:17-cv-01606-JAD-CWH
17 vs.)
18 PORTFOLIO RECOVERY ASSOCIATES, LLC, a)
19 foreign limited liability company; and EXPERIAN)
20 INFORMATION SOLUTIONS, INC.,)
21 Defendants.)
22 _____)
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18 Pursuant to Fed. R. Civ. P. 16(b)(4), LR IA 6-1, and LR 26-4, Plaintiff Javier Del Rivero;
19 Defendant Portfolio Recovery Associates, LLC (“PRA”); and Defendant Experian Information
20 Solutions, Inc. (“Experian”) (collectively, the “Parties”), by and through their respective counsel
21 of record, hereby stipulate to amend the Amended Scheduling Order entered on September 5,
22 2017, ECF No. 19.

23 The Parties seek to extend the discovery cut-off by sixty (60) days. The current
24 discovery cut-off is January 16, 2018. See ECF No. 19. The Parties request to extend this
25 deadline to **March 19, 2018**. In addition, the Parties request that the dispositive motions and
26 pretrial order deadlines be extended for an additional sixty (60) days, or until **April 13, 2018**
27 (dispositive motions) and **May 14, 2018** (pretrial order).

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1 **I. Discovery Completed**

2 To date, the Parties have completed the following discovery: the Parties have each
3 served initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1); PRA propounded Requests for
4 Production and Interrogatories on Plaintiff; Experian propounded Request for Production,
5 Interrogatories, and Requests for Admission on Plaintiff; and Plaintiff propounded Request for
6 Production, Interrogatories, and Requests for Admission upon both PRA and Experian. All
7 parties have served responses to these requests.

8 **II. Discovery That Remains to be Completed**

9 The Parties still need to conduct the deposition of Plaintiff, previously scheduled for
10 December 18, 2017, and to complete any discovery allowed by the Court's disposition of PRA's
11 Motion to Compel Production of Documents and Responses to Interrogatories and Requests for
12 Production and for Sanctions, ECF No. 22 ("Motion to Compel"), which is pending.

13 **III. Reasons Why Discovery Was Not Completed**

14 Here, good cause exists to extend the discovery cut-off. On December 12, 2017, PRA
15 filed the Motion to Compel. In the Motion to Compel, PRA seeks the Court's assistance to
16 compel Plaintiff's responses to PRA's Requests for Production and Interrogatories. PRA
17 anticipates the briefing on the Motion to Compel will be complete on or about January 2, 2018.
18 The deposition of Plaintiff was previously scheduled for December 18, 2017. The Parties agreed
19 to postpone the deposition of Plaintiff to allow the Court to first address the Motion to Compel.
20 Therefore, the Parties seek a brief extension of the discovery cut-off for the Court to first resolve
21 the Motion to Compel and for the deposition of Plaintiff to proceed thereafter.

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1 **IV. Proposed Schedule to Complete Remaining Discovery**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	January 16, 2018	March 19, 2018
Dispositive Motions	February 12, 2018	April 13, 2018
Pre-Trial Order	March 14, 2018	May 14, 2018

7 Dated this 19th date of December, 2017

Dated this 19th date of December, 2017

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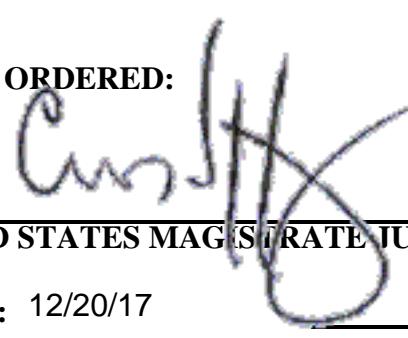
Attorneys for Defendant Experian
Information Solutions, Inc.

16 Dated this 19th date of December, 2017

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25 Attorney Plaintiff Javier Del Rivero

26 **IT IS SO ORDERED:**

27 
UNITED STATES MAGISTRATE JUDGE

28 **DATED: 12/20/17**