



1 **SAO**
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 9 *Attorneys for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**
 11 **CLARK COUNTY, NEVADA**

13 LOUIS ROCK and DEBBY ROCK,
 14 Individually and as Husband and Wife,

15 Plaintiffs,

16 vs.

17 NINYO & MOORE, GEOTECHNICAL
 18 CONSULTANTS dba NINYO & MOORE
 19 GEOTECHNICAL & ENVIRONMENTAL
 20 SCIENCES CONSULTANTS, a Foreign
 Corporation; ROADS SAFE TRAFFIC
 21 SYSTEMS, INC., a Foreign Corporation; DOE
 INDIVIDUALS 1 through 100; and ROE
 22 CORPORATIONS 1 through 100, inclusive,

23 Defendants.

CASE NO. 2:17-cv-01676-APG-CWH

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES**

(SECOND REQUEST)

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 ...

1 IT IS HEREBY STIPULATED by and between Plaintiffs LOUIS AND DEBBY ROCK,
2 by and through their counsel of record, JOSEPH TROIANO, ESQ., of EGLET PRINCE,
3 Defendant ROADS SAFE TRAFFIC SYSTEMS, INC. by and through their counsel of record,
4 JASON C. FOULGER, ESQ., of CISNEROS & MARIAS, Defendant NINYO & MOORE,
5 GEOTECHNICAL DBA CONSULTANTS DBA NINYO & MOORE GEOTECHNICAL &
6 ENVIROMENTAL SCIENCES CONSULTANTS by and through their counsel of record,
7 MICHAEL R. HALL, ESQ., of HALL JAFFE & CLAYTON, LLP., that discovery in this matter
8 shall be extended for the limited purpose of completing the discovery described herein. Pursuant
9 to Local Rules (“LR”) 6-1, 6-2, 7-1, and 26-4, the parties offer the following in support of their
10 stipulation to extend discovery:
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13 **I.**

14 **DISCOVERY COMPLETED TO DATE**

15 **Plaintiffs served Defendants with the following discovery to date:**

- 16 1. Plaintiffs’ Initial NRCP 16.1 disclosures and Four (4) Supplements thereto;
- 17 2. Plaintiffs’ Responses to Defendant’s Requests for Production, Requests for
18 Admissions and Interrogatories; and
- 19 3. Plaintiffs’ Requests for Production, Requests for Admissions and Interrogatories
20 to Defendants;
- 21 4. Plaintiffs’ Expert Disclosure and Supplemental NRCP 16.1 (a)(3) Pre-Trial
22 Disclosures and Two (2) Supplements thereto.

23 **Defendant Roadsafe Traffic Systems, Inc., served Plaintiffs with the following**
24 **discovery to date:**

- 25 1. Defendant’s Initial NRCP 16.1 disclosure;
- 26 2. Defendant’s Requests for Production of Documents, Interrogatories and Requests
27 for Admissions to Plaintiff; and
- 28 3. Defendant’s Answers to Plaintiff’s Requests for Production and Interrogatories to
Plaintiff.

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V.

CURRENT DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties: February 9, 2018;
Initial Expert Disclosure: February 9, 2018;
Rebuttal Expert Disclosures: March 12, 2018;
Discovery Cutoff: April 10, 2018;
Dispositive Motions: May 10, 2018; and
Trial: TBD.

VI.

PROPOSED DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties: March 27, 2018;
Initial Expert Disclosure: March 27, 2018;
Rebuttal Expert Disclosures: April 26, 2018;
Discovery Cutoff: June 25, 2018;
Dispositive Motions: July 25, 2018; and
Trial: TBD.

DATED this 2nd day of February, 2018.

EGLET PRINCE

/s/ Joseph Troiano
ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
TRACY A. EGLET, ESQ.
Nevada Bar No. 6419
JOSEPH J. TROIANO, ESQ.
Nevada Bar No. 12505
Attorneys for Plaintiff

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DATED this 2nd day of February, 2018.

HALL JAFFE & CLAYTON, LLP.

/s/ Michael Hall
MICHAEL R. HALL, ESQ.
Nevada Bar No. 5978
7425 Peak Drive
Las Vegas, NV 89128
Attorney for Defendants

DATED this 2nd day of February, 2018.

CISNEROS & MARIAS

/s/ Jason Foulger
JASON C. FOULGER, ESQ.
Nevada Bar No. 7338
1160 North Town Center Dr., Suite 130
Las Vegas, Nevada 89144
Attorney for Defendants

ORDER

IT IS SO ORDERED

DATED this February 6, 2018.


UNITED STATE MAGISTRATE JUDGE

RESPECTFULLY SUBMITTED BY:
EGLET PRINCE

/s/ Joseph Troiano
ROBERT T. EGLET, ESQ.
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