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7  
 8 UNITED STATES DISTRICT COURT  
 9 DISTRICT OF NEVADA

11 NANCY CALARCO,  
 12 Plaintiff,  
 13 vs.  
 14 SUNRISE HOSPITAL AND MEDICAL  
 CENTER, LLC,  
 15 Defendant.

CASE NO. 2:17-cv-01682-APG-GWF

**STIPULATION AND ORDER TO EXTEND  
 DISCOVERY AND OTHER DEADLINES  
 (FIRST REQUEST)**

17 Pursuant to LR 26-4, the parties, by and through their respective counsel of record,  
 18 hereby stipulate and request that this Court extend discovery in the above-captioned case sixty  
 19 (60) days, up to and including April 30, 2018. In addition, the parties request that the  
 20 dispositive motions and pretrial order deadlines be extended in accordance with the discovery  
 21 extension as outlined herein. In support of this Stipulation and Request, the parties state as  
 22 follows:

- 23 1. On June 16, 2017, Plaintiff filed her Complaint (ECF No. 1).
- 24 2. On September 1, 2017, Defendant filed its Answer to the Complaint (ECF No. 13).
- 25 3. On October 10, 2017, the parties prepared and filed their Proposed Discovery Plan  
 26 and Scheduling Order (ECF No.16). The Court approved and entered the  
 27 Discovery Plan and Scheduling Order on October 11, 2017 (ECF No. 17).

- 1 4. Defendant produced served its initial disclosures pursuant to Rule 26(a)(1) on  
2 November 6, 2017. Plaintiff served her initial disclosures pursuant to Rule 26(a)(1)  
3 on November 16, 2017.
- 4 5. Defendant served written discovery requests (Interrogatories and Requests for  
5 Production of Documents) to Plaintiff on November 14, 2017. Plaintiff responded  
6 to the Interrogatories on December 29, 2017 and to the Requests for Production on  
7 January 2, 2018.
- 8 6. The parties participated in an Early Neutral Evaluation (“ENE”) on November 16,  
9 2017.
- 10 7. Plaintiff provided First Supplemental Responses to Defendant’s Interrogatories,  
11 First Supplemental Responses to Defendant’s Requests for Production and First  
12 Supplemental Disclosures on January 16, 2018.
- 13 8. Plaintiff provided Second Supplemental Responses to Defendant’s Requests for  
14 Production and Second Supplemental Disclosures on January 18, 2018.
- 15 9. Plaintiff propounded Interrogatories and Requests for Production of Documents on  
16 Defendant on January 18, 2018. Defendant is in the process of obtaining  
17 information to respond to these written discovery requests.
- 18 10. Plaintiff’s deposition was scheduled to be taken on several occasions but has been  
19 continued due to conflicts with Plaintiff’s work schedule and most recently as a  
20 result of an illness in the family of a Sunrise representative assisting in the defense  
21 of this matter.

22 **DISCOVERY REMAINING**

- 23 1. Defendant intend to provide responses to Plaintiff’s written discovery on February  
24 20, 2018, unless additional time is required.
- 25 2. Defendant intends to take Plaintiff’s deposition at the end of February or during the  
26 first week of March, 2018.
- 27 3. The parties will take the depositions of any and all other necessary witnesses as  
28 determined through discovery.

1           4.       The parties will issue and respond to any necessary additional written discovery.

2           This Request for an extension of time is not sought for any improper purpose or other  
 3 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient  
 4 time to finish necessary discovery.

5                               **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

6           As indicated above, Plaintiff’s deposition has been postponed on two occasions, initially as  
 7 a result of a conflict with Plaintiff’s work schedule and most recently as a result of an illness in the  
 8 family of a Sunrise representative who is assisting with the defense of this matter. An additional  
 9 60 days will allow the parties to take depositions and follow up with any necessary written  
 10 discovery within the time frame of the extension.

11           In light of these circumstances, the parties require the brief requested extension in order to  
 12 complete discovery. The following is a list of the current discovery deadlines and the parties’  
 13 proposed extended deadlines.

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Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>February 28, 2018</i>	<i>April 30, 2018</i>
Dispositive Motion	<i>March 30, 2018</i>	<i>May 29, 2018</i>
Pretrial Order	<i>April 30, 2018</i>	<i>June 29, 2018</i>

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20           This Request for an extension of time is not sought for any improper purpose or other  
 21 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient  
 22 time to finish necessary discovery.

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APPROVED AS TO FORM AND CONTENT.


DATED this 7<sup>th</sup> day of February, 2018.

DATED this 7<sup>th</sup> day of February, 2018.

LEWIS BRISBOIS BISGAARD  
& SMITH LLP

REMPFER MOTT LUNDY, PLLC

By

  
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Attorneys for Defendant

Attorneys for Plaintiff

**ORDER**



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UNITED STATES MAGISTRATE JUDGE

DATED: February 8, 2018