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13 *Attorneys for Plaintiff*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16
 17 RODNEY MOTT,
 18 Plaintiff,

19 vs.

20 TRINITY FINANCIAL SERVICES, LLC; and
 21 TRINITY RECOVERY SERVICES, LLC,
 22 Defendants.

Case No.: 2:17-cv-01754-RFB-GWF

STIPULATION FOR EXTENSION OF TIME

(SECOND REQUEST)

23 Pursuant to LR 6-1 and LR 26-4, Plaintiff and Defendants Trinity Financial Services,
 24 LLC and Trinity Recovery Services, LLC (collectively, "Defendants"), by and through their
 25 respective counsel of record, hereby stipulate and request that this Court extend the discovery
 26 deadline by thirty (30) days. At this time, the parties are not seeking an extension of any other

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1 discovery deadlines but reserve the right to request in the future depending on adjudication of
2 Plaintiff's Motion for Leave to Amend, ECF Dkt. 8. In support of this Stipulation and Request,
3 the parties state as follows:

4 **I. DISCOVERY COMPLETED TO DATE**

- 5 1. Plaintiff filed the instant complaint on June 26, 2017. ECF Dkt. 1.
6 2. On August 4, 2017, Defendants filed their answers. ECF Dkt. 4, 5.
7 3. On September 15, 2018, Plaintiff served his Initial Disclosures.
8 4. On September 18, 2017, Plaintiff moved for leave to amend his complaint. ECF
9 Dkt. 8.
10 5. On September 28, 2017, the Court granted the parties' stipulated protective order.
11 ECF Dkt. 11.
12 6. On October 10, 2017, the Court granted the parties' stipulated discovery plan and
13 scheduling order. ECF Dkt. 17.
14 7. On October 13, 2017, Plaintiff propounded his First Set of Requests for
15 Production and Interrogatories on Defendants.
16 8. On November 17, 2017, Defendants responded to Plaintiff's First Set of Requests
17 for Production and Interrogatories.
18 9. On December 9, 2017, Plaintiff served his First Supplemental Disclosures.
19 10. On December 12, 2017, the parties conducted a Rule 26-7 conference regarding
20 Defendants' responses to Plaintiff's First Set of Requests for Production and Interrogatories.
21 11. On January 25, 2018, Defendants provided their First Supplemental Responses to
22 Plaintiff's First Set of Requests for Production and Interrogatories.
23 12. On February 9, 2018, the parties submitted an interim status report. ECF Dkt. 22.
24 13. On March 20, 2018, Plaintiff propounded his Notice of Deposition on Defendants,
25 setting the date of the depositions of both defendants for April 9, 2018.
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1 14. On March 22, 2018, Plaintiff served his Second Supplemental Disclosures.

2 15. On May 15, 2018, Plaintiff propounded his Second Notice of Deposition on
3 Defendants, setting the date of the depositions of both defendants for June 4, 2018.

4 16. On May 16, 2018, Plaintiff propounded deposition subpoenas and subpoenas for
5 records on third parties Corelogic Credco, DBI Co-Investor Fund VII, LLC, Dreambuilder
6 Investments, LLC, Land Home Financial Services, Ophrys, LLC, Stelis, LLC, Experian
7 Information Solutions, Inc., and Trans Union, LLC.

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9 **B. Specific Description of Discovery that Remains to be Completed**

- 10 1. The depositions of Defendants;
- 11 2. Depositions and discovery to any third party witnesses; and,
- 12 3. Any necessary additional written discovery.

13 **C. Reasons Why the Remaining Discovery Was Not Completed**

14 The parties aver, pursuant to LR 6-1, that good cause and excusable neglect exists for the
15 requested extension. Plaintiff has set the deposition of Defendants' person most knowledgeable
16 for June 4, 2018. However, earlier this week the parties were advised that Defendants'
17 representative will be recovering from a medical procedure in early June and likely will be
18 unavailable to sit for his deposition on the chosen date and time. Prior to notification, the parties
19 had no indication that Defendant's representative would not be in a position to sit for his
20 deposition. A 30-day extension will permit Defendant's representative sufficient time to

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convalesce and to arrange the deposition for a date thereafter.

D. Proposed Discovery Deadlines

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	June 11, 2018	July 11, 2018
Deadline to Amend Pleadings	January 11, 2018	Same
Deadline to Disclose Initial Experts	February 12, 2018	Same
Deadline to Disclose Rebuttal Experts	March 14, 2018	Same
Dispositive Motions	July 11, 2018	August 10, 2018
Pre-Trial Order	August 13, 2018	September 10, 2018 (or 31 days after dispositive motions)

IT IS SO STIPULATED.

Dated May 25, 2018

<p><u>/s/ Miles N. Clark</u> Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 KNEPPER & CLARK LLC Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com</p> <p>David H. Krieger, Esq. Nevada Bar No. 9086 HAINES & KRIEGER, LLC Email: dkrieger@hainesandkrieger.com <i>Counsel for Plaintiff</i></p>	<p><u>/s/ Alan Ceran</u> Alan Ceran, Esq. <i>pro hac vice</i> BURKE, WILLIAMS & SORENSEN, LLP 444 S. Flower St., Ste. 2400 Los Angeles, CA 90071 Email: aceran@bwslaw.com</p> <p>Richard J. Reynolds, Esq. BURKE, WILLIAMS & SORENSEN, LLP 1851 East First Street, Suite 1550 Santa Ana, CA 92705, CA 92705 Email: rreynolds@bwslaw.com</p> <p>Michael R. Brooks, Esq. KOLESAR & LEATHAM 400 S. Rampart Boulevard, Suite 400 Las Vegas, NV 89145 Email: mbrooks@klnevada.com <i>Counsel for Defendants</i></p>
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ORDER

IT IS SO ORDERED.

Dated: 5-29-2018

UNITED STATES MAGISTRATE JUDGE

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