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5 Attorneys for Defendant,
 6 *THE VONS COMPANIES, INC*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9	FRANCINE SCOLARO, an individual,)	
10)	Case No. 2:17-cv-01979-JAD-VCF
	Plaintiff,)	
11)	STIPULATION AND ORDER
	vs.)	TO EXTEND DISCOVERY
12)	
	THE VONS COMPANIES, INC.; DOES I)	(FIRST REQUEST)
13	through X.; and ROE CORPORATIONS XI)	
	through XX, inclusive,)	
14)	
	Defendants.)	

15 **COME NOW**, Plaintiff FRANCINE SCOLARO, by and through her counsel Steven
 16 Mack, Esq. of Black & Lobello and Defendant, The Vons Companies, Inc., by and through its
 17 counsel Jack P. Burden, Esq. of Backus, Carranza & Burden, and hereby stipulate to the extension
 18 of all remaining discovery deadlines by sixty (60) days. Therefore, the parties propose the
 19 following revised discovery plan:

20 **DISCOVERY COMPLETED TO DATE**

21 The parties have exchanged initial and disclosures of documents and the names of
 22 individuals with knowledge of the facts pertaining to the claims set forth in this matter. Defendant
 23 has propounded written discovery requests including interrogatories and requests for production.
 24 Defendant has taken Ms. Scolaro's deposition.
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DISCOVERY TO BE COMPLETED

Plaintiffs intend propound discovery to Defendant and intend to disclose liability and damages experts. Defendant intend to disclose liability and damages experts. Plaintiff seeks to perform a site inspection of the subject store. Defendant further seeks to depose Plaintiff’s medical providers and experts thereafter. Plaintiff intends to depose the Defendant’s “PMK” as well as the only known percipient witness. Defendant intends to have Plaintiff undergo a Independent Medical Examination. Plaintiff intends to take the deposition of Defendants’ experts.

REASONS FOR EXTENSION TO COMPETE DISCOVERY

Despite the good faith efforts of the parties to comply with the Court’s discovery deadlines, both parties have scheduling conflicts and need additional time for additional medical records, Independent Medical Examination, and expert designations. This request is made in good faith, not for the purpose of delay.

PROPOSED NEW DISCOVERY DEADLINES

Expert Disclosure Deadline:

Currently: 2/23/18

Proposed: 5/25/18

Interim Status Report:

Currently: 1/26/18

Proposed: 5/25/18

Rebuttal Expert Disclosure Deadline:

Currently: 3/23/18

Proposed: 6/25/18

Discovery Deadline:

Currently: 5/25/18

Proposed: 7/24/18

1 **Deadline to File Dispositive Motions:**

2 Currently: 6/22/18

3 Proposed: ~~9/24/18~~ 8-24-2018

4 **Pre-Trial Order Deadline:**

5 Currently: 7/23/18

6 Proposed: ~~10/23/18~~ 9-24-2018

7 DATED: this 23rd day of January, 2018

DATED: this 23rd day of January, 2018

8 **BLACK & LOBELLO**

BACKUS, CARRANZA & BURDEN

9 By: /s/ Steven Mack

By: /s/ Jack P. Burden

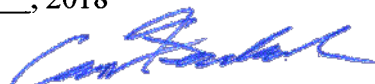
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23 *Attorneys for Defendant*

24 **ORDER**

25 IT IS SO ORDERED.

DATED: this 24th day of January, 2018



UNITED STATES MAGISTRATE JUDGE

DATED this 23RD day of January, 2018.

Respectfully Submitted,
BACKUS, CARRANZA & BURDEN

By: /s/ Jack P. Burden

Jack P. Burden, Esq.
3050 South Durango Drive
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Attorney for Defendant, *The Vons Companies, Inc*