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7 Attorneys for Defendant
 The Vons Companies, Inc.

8
 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 FRANCINE SCOLARO, an individual,

12 Plaintiff,

13 vs.

14 THE VONS COMPANIES, INC.; DOES I
 through X, and ROE CORPORATIONS XI
 15 through XX, inclusive,

16 Defendants.

Case No. 2:17-cv-01979-JAD-VCF

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)

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 18 In accordance with Local Rules of Practice for the United States District Court for the
 19 District of Nevada (“LR”) 26-4, Defendant The Vons Companies, Inc. (“Defendant”), by and
 20 through its counsel of record, BACKUS, CARRANZA & BURDEN, and Plaintiff Francine Scolaro
 21 (“Plaintiff”), by and through her counsel of record, BLACK & LOBELLO, hereby stipulate and
 22 agree to an extension of all remaining discovery deadlines by sixty (60) days. The parties
 23 propose the following revised discovery plan:

24 **DISCOVERY COMPLETED TO DATE**

25 The parties have exchanged initial and supplemental disclosures of documents and the

1 names of individuals with knowledge of the facts pertaining to the claims set forth in this matter.
2 Defendant has propounded written discovery requests including interrogatories and requests for
3 production. Defendant has taken Plaintiff's deposition. Plaintiff has propounded requests for
4 interrogatories, production of documents, and admissions. Plaintiff has also taken the deposition
5 of Defendant's employees.

6 **DISCOVERY TO BE COMPLETED**

7 Plaintiff seeks to perform a site inspection of the subject store. Defendant intends to depose
8 Plaintiff's medical providers. Plaintiff intends to depose the Defendant's "PMK" as well as the only
9 known percipient witness. The parties intend to disclose and depose liability and damages experts.
10 Defendant intends to have Plaintiff undergo an Independent Medical Examination.

11 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

12 Plaintiff was scheduled to undergo an Independent Medical Examination ("IME") by Dr.
13 Howard Tung on April 12, 2018. However, Plaintiff's mother passed away the night before. Thus,
14 Plaintiff was not able to attend the scheduled IME. Due to Dr. Tung's busy schedule, Defendant
15 was not able to schedule another IME for immediately thereafter. The parties therefore request for a
16 60-day extension of the remaining discovery deadlines so that an IME could be scheduled and
17 conducted. This request is made in good faith, not for the purpose of delay.

18 **PROPOSED NEW DISCOVERY DEADLINES**

19 **Expert Disclosure Deadline:**

20 Currently: 5/25/18

21 **Proposed: 7/24/18**

22 **Interim Status Report:**

23 Currently: 5/25/18

24 **Proposed: 7/24/18**

25 **Rebuttal Expert Disclosure Deadline:**

Currently: 6/25/18

Proposed: 8/24/18

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Discovery Deadline:

Currently: 7/24/18

Proposed: 9/24/18

Deadline to File Dispositive Motions:

Currently: 8/24/18

Proposed: 10/23/18

Pre-Trial Order Deadline:

Currently: 9/24/18

Proposed: 11/23/18

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED: this 26th day of April, 2018

DATED: this 26th day of April, 2018

BLACK & LOBELLO

BACKUS, CARRANZA & BURDEN

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ORDER

IT IS SO ORDERED.

DATED: this 30th day of April, 2018.

UNITED STATES MAGISTRATE JUDGE