

NETTLES LAW FIRM

1389 Galleria Drive Suite 200
Henderson, NV 89014
(702) 434-8282 / (702) 434-1488 (fax)

1 BRIAN D. NETTLES, ESQ.
Nevada Bar No. 7462
2 CHRISTIAN M. MORRIS, ESQ.
Nevada Bar No. 11218
3 EDWARD J. WYNDER, ESQ.
Nevada Bar No. 13991
4 NETTLES LAW FIRM
5 1389 Galleria Drive, Suite 200
Henderson, Nevada 89014
6 Telephone: (702) 434-8282
7 Facsimile: (702) 434-1488
8 brian@nettlslawfirm.com
9 christian@nettlslawfirm.com
10 edward@nettlslawfirm.com
11 Attorneys for Plaintiff

**STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 ROBERT FLORES, an individual,
13
14 Plaintiff,

15 vs.

16 WAL-MART STORES, INC., a foreign
17 corporation d/b/a Wal-Mart Neighborhood
18 Market #3355; JONATHAN SOROLA, an
19 individual; DOES 1 through 10, inclusive; ROE
20 CORPORATIONS 11 through 20, inclusive; and
ABC LIMITED LIABILITY COMPANIES 21
through 30, inclusive,

21 Defendant(s).

CASE NO.: 2:17-cv-01991-JAD-NJK

**STIPULATION TO EXTEND
DISCOVERY DEADLINES (FIRST
REQUEST)**

22 Plaintiff, Robert Flores (“Plaintiff”), by and through his counsels of record, Brian D.
23 Nettles, Esq. Christian M. Morris, Esq., and Edward J. Wynder, Esq., of Nettles Law Firm, and
24 Defendant, Wal-Mart Stores, Inc. d/b/a Wal-Mart Neighborhood Market #3355 (“Defendant”),
25 by and through its counsel of record, Timothy D. Kuhls, Esq., Esq., of Phillips, Spallas &
26 Angstadt, LLC, hereby stipulate to the extension of all remaining discovery deadlines by sixty
27 (60) days pursuant to LR 26-4.
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STIPULATED APPLICATION

WHEREAS, the parties have begun discovery but still have substantial discovery to complete before they will be ready for trial, the parties request a sixty (60) day extension of certain discovery deadlines as set forth below.

A. DISCOVERY COMPLETED TO DATE

1. The parties participated in the Fed. R. Civ. P 26(f) conference on August 15, 2017.
2. Plaintiff made his pre-discovery disclosures pursuant to Fed. R. Civ. P 26.1(a)(1) on August 28, 2017. Defendant served its pre-discovery disclosures pursuant to Fed. R. Civ. P. 26.1(a)(1) on September 15, 2017.
3. Defendant propounded written discovery to Plaintiff on September 18, 2017 and Plaintiff responded to Requests for Admissions on October 11, 2017 and Requests for Production of Documents on October 16, 2017 and Interrogatories on October 16, 2017.
4. Plaintiff propounded written discovery to Defendant on November 1, 2017.

B. SPECIFIC DESCRIPTION OF THE DISCOVERY TO BE COMPLETED

Plaintiff has been unable to designate a medical expert or produce a report due to scheduling conflicts of the expert. Defendant’s responses to Plaintiff’s written discovery is due December 1, 2017. The parties have conducted one deposition of Defendant’s girlfriend, the deposition of one of Defendant’s employees is currently scheduled. The parties intend to depose several individuals including Plaintiff, Defendant’s Rule 30(b)(6) designee(s), treating medical professionals, expert witnesses and other employees of Defendant.

C. REASONS FOR EXTENSION TO COMPLETE DISCOVERY

Despite the good faith efforts of the parties to comply with the Court’s discovery deadlines, various scheduling conflicts have occurred. As set forth above, Plaintiff has experienced a delay in producing a medical expert report due to the scheduling conflicts of the medical expert. Accordingly, the parties believe a sixty (60) day extension to discovery is warranted and prudent. This request is made in good faith and not for the purpose of delay.

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D. PROPOSED NEW DISCOVERY PLAN DEADLINES

Last date to complete discovery:
 Currently: Friday, February 9, 2018
 Proposed: Tuesday, April 10, 2018

Last date to amend pleadings and add parties:
 Currently: Friday, November 10, 2017
 Proposed: Tuesday, January 9, 2018

Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2):
 Currently: Monday, December 11, 2017
 Proposed: Friday, February 9, 2018

Last date to disclose rebuttal experts:
 Currently: Wednesday, January 10, 2018
 Proposed: Monday, March 12, 2018

Last date to file interim status report:
 Currently: Monday, December 11, 2017
 Proposed: Friday, February 9, 2018

Last date to file dispositive motions:
 Currently: Friday, March 9, 2018
 Proposed: Tuesday, May 8, 2018

Last date to file joint pretrial order:
 Currently: Friday, April 6, 2018
 Proposed: Tuesday, June 5, 2018

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CONCLUSION

Therefore, based upon the foregoing, the parties respectfully request that this Stipulation to Extend Discovery (First Request) be granted and that the Court adopt the proposed dates mentioned above.

DATED this 9th day of November, 2017.

DATED this 9th day of November, 2017.

NETTLES LAW FIRM

PHILLIPS, SPALLAS & ANGSTADT LLC

/s/ Christian M. Morris, Esq.

/s/ Timothy D. Kuhls, Esq.

BRIAN D. NETTLES, ESQ.

TIMOTHY D. KUHL, ESQ.

Nevada Bar No. 7462

Nevada Bar No. 13362

CHRISTIAN M. MORRIS, ESQ.

Attorneys for Defendant

Nevada Bar No. 11218

EDWARD J. WYNDER, ESQ.

Nevada Bar No. 13991

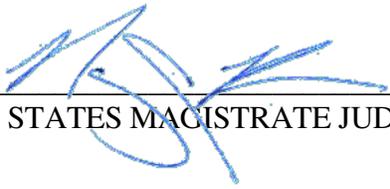
Attorneys for Plaintiff

Case Name: Flores v. Wal-Mart Stores, Inc.

Case Number: 2:17-cv-01991-JAD-NJK

IT IS SO ORDERED:

Dated: November 13, 2017



UNITED STATES MAGISTRATE JUDGE