

1 **GEORGE M. RANALLI, ESQ.**  
 Nevada Bar No. 5748  
 2 **BENJAMIN J. CARMAN, ESQ.**  
 Nevada Bar No. 12565  
 3 **RANALLI ZANIEL FOWLER & MORAN, LLC**  
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 Attorneys for Defendant  
 6 State Farm Mutual Automobile Insurance Company

7  
 8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9  
 10 **CHARLES KEENAN, Individually;**  
**TAMMY KEENAN, individually;**

2:17-cv-01999-RFB-VCF

11 Plaintiff,

12 v.

\*SUBMITTED IN COMPLIANCE  
 WITH LR 26-1(e) \*

13 **STATE FARM MUTUAL AUTOMOBILE**  
 14 **INSURANCE COMPANY; DOES I-X,**  
 15 **and ROE CORPORATIONS I-X,**  
**inclusive**

16 Defendant

17  
 18 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**  
**(FIRST REQUEST)**

19 Pursuant to Local Rules 6-1 and 26-4, the parties, by and  
 20 through their respective counsel of record, hereby stipulate to  
 21 and request that the Court extend the deadlines by sixty days.

22 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**  
 23  
 24

RANALLI ZANIEL FOWLER & MORAN, LLC  
 2400 W. HORIZON RIDGE PARKWAY  
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1 The following discovery has been completed by the parties:

- 2 1. Defendant's Initial Disclosure, pursuant to FRCP  
3 26(f);
  - 4 2. Plaintiff's Initial Disclosure, pursuant to FRCP  
5 26(f);
  - 6 3. Defendant's First Supplemental Initial Disclosure,  
7 pursuant to FRCP 26(f);
  - 8 4. Defendant's First Set of Request for Admissions to  
9 Plaintiff, Charles Keenan;
  - 10 5. Defendant's First Set of Request for Admissions to  
11 Plaintiff, Tammy Keenan;
  - 12 6. Plaintiff's Requests for Admissions to Defendant;
  - 13 7. Plaintiff, Charles Keenan, Responses to Defendant's  
14 Requests for Admissions;
  - 15 8. Plaintiff, Tammy Keenan, Responses to Defendant's  
16 Requests for Admissions;
  - 17 9. Defendant's Responses to Plaintiff's Requests for  
18 Admissions;
  - 19 10. Plaintiff's Interrogatories to Defendant;
  - 20 11. Defendant's Interrogatories to Plaintiff, Charles  
21 Keenan;
  - 22 12. Defendant's Interrogatories to Plaintiff, Tammy  
23 Keenan;
- 24

- 1 13. Plaintiff, Charles Keenan, Responses to Defendant's
- 2 Interrogatories;
- 3 14. Plaintiff, Tammy Keenan, Responses to Defendant's
- 4 Interrogatories;
- 5 15. Defendant's Responses to Plaintiff's Interrogatories;
- 6 16. Defendant's Request for Production of Documents to
- 7 Plaintiff, Charles Keenan;
- 8 17. Defendant's Request for Production of Documents to
- 9 Plaintiff, Tammy Keenan;
- 10 18. Plaintiff's Request for Production of Documents to
- 11 Defendant;
- 12 19. Plaintiff, Charles Keenan, Responses to Defendant's
- 13 Request for Production of Documents;
- 14 20. Plaintiff, Tammy Keenan, Responses to Defendant's
- 15 Request for Production of Documents;
- 16 21. Defendant's Responses to Plaintiff's Request for
- 17 Production of Documents;

18 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**

19 **COMPLETED:**

- 20 1. Depositions of the Person Most Knowledgeable from
- 21 Plaintiff's medical providers relevant to treatment
- 22 rendered to Plaintiff since the date of this accident;
- 23 2. Deposition of Plaintiff;
- 24 3. Deposition of Defendant's representatives;

- 1 4. Disclosures of Plaintiff and Defendant's experts;
- 2 5. Depositions of Plaintiff and Defendant's experts;
- 3 6. Independent Medical Examination of Plaintiff, Tammy
- 4 Keenan;

5 **A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED**  
6 **WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:**

7 Both parties have been working diligently to move this  
8 matter forward. At this time both parties are requesting are  
9 requesting an additional sixty days to obtain experts. Both  
10 parties believe that the additional time will allow the parties  
11 to retain their experts during the holiday time, obtain the  
12 remaining depositions and perform an Independent Medical  
13 Examination of Plaintiff, Tammy Keenan. Further, the parties  
14 believe that this will better position the parties for a  
15 potential settlement conference and early resolution of this  
16 dispute.

17 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	<b>Old Deadline</b>	<b>New Deadline</b>
18		
19	Discovery Cut off:	02/19/18 04/20/2018
20	Amending Pleadings & Adding Parties:	11/21/17 CLOSED
21		
22	Expert Disclosure:	12/21/17 02/19/2018
23	Rebuttal of Experts:	01/17/2018 03/21/2018
24	Interim Status Report:	12/21/2017 02/19/2018

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1 Dispositive Motions: 03/20/2018 05/21/2018

2 **F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY DELAYIN**  
3 **DISCOVERY OR THE TRIAL OF THIS MATTER.**

4 Dated: December 5<sup>th</sup>, 2017 Dated: December 5<sup>th</sup>, 2017

5 **RANALLI ZANIEL FOWLER & MORAN, GLEN LERNER INJURY ATTORNEYS**  
6 **LLC**


7 /s/ Benjamin J. Carman  
8 GEORGE M. RANALLI, ESQ.  
9 Nevada Bar No. 5748  
10 BENJAMIN J. CARMAN, ESQ.  
11 Nevada Bar No. 12565  
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14 Attorneys for Defendant

/s/ Joshua L. Benson  
JOSHUA L. BENSON, ESQ.  
Nevada Bar No. 10514  
4795 South Durango Drive  
Las Vegas, NV 89147  
Attorney for Plaintiffs,  
Charles Keenan and  
Tammy Keenan

**ORDER**

13 IT IS SO ORDERED:

14 Dated: 12-6-2017  
15 \_\_\_\_\_

  
UNITED STATES MAGISTRATE JUDGE

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17  
18 The Joint Pretrial Order is due June 21, 2018. If dispositive motions are filed, the deadline  
19 for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive  
20 motions or further court order.  
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