

1 **GEORGE M. RANALLI, ESQ.**
 Nevada Bar No. 5748
 2 **BENJAMIN J. CARMAN, ESQ.**
 Nevada Bar No. 12565
 3 **RANALLI ZANIEL FOWLER & MORAN, LLC**
 2400 W. Horizon Ridge Parkway
 4 Telephone: (702) 477-7774
 Facsimile: (702) 477-7778
 5 ranalliservice@ranallilawyers.com
 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**
(SECOND 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 ///

RANALLI ZANIEL FOWLER & MORAN, LLC
 2400 W. HORIZON RIDGE PARKWAY
 HENDERSON, NEVADA 89052
 TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

1 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

2 The following discovery has been completed by the parties:

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

- 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 22. Deposition of Plaintiff, Charles Keenan;
- 19 23. Deposition of Plaintiff, Tammy Keenan;
- 20 24. Disclosures of Plaintiff and Defendant's experts;

21 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO**
22 **BE COMPLETED:**

- 23 1. Depositions of Dr. Rosler, Dr. Gabroy, Dr. Sorelle and
- 24 Dr. Germin from Plaintiff's medical providers relevant

1 to treatment rendered to Plaintiff since the date of
2 this accident;

3 2. The depositions of Defendants 30(b)(6) witness, Holly
4 Spinks and Craig Falvo of State Farm .

5 **C. 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 depose the remaining
10 medical experts and State Farm employees. Both parties believe
11 that the additional time will allow the parties to schedule the
12 remaining depositions. Further, the parties believe that this
13 will better position the parties for a potential settlement
14 conference and early resolution of this dispute.

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

	Old Deadline	New Deadline
17 Discovery Cut off:	04/20/2018	06/20/2018
18 Amending Pleadings & Adding Parties:	11/21/17	CLOSED
19 Expert Disclosure:	2/09/2018	CLOSED
20 Rebuttal of Experts:	03/21/2018	CLOSED
21 Interim Status Report:	2/19/2018	CLOSED
22 Dispositive Motions:	05/21/2018	07/21/2018

23 **Joint Pretrial Order** 08/21/2018

24 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.

1 SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

3 Dated: April 16, 2018

Dated: April 16, 2018

4 RANALLI ZANIEL FOWLER & MORAN

GLEN LERNER INJURY ATTORNEYS

5
6 /s/ BENJAMIN CARMAN
7 GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
8 BENJAMIN J. CARMAN, ESQ.
Nevada Bar No. 12565
9 2400 W. Horizon Ridge Parkway
Henderson, Nevada 89052
10 Attorneys for Defendant,
State Farm Mutual Automobile
11 Insurance Company

/s/ JOSHUA 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

12
13
14 **ORDER**

15 IT IS SO ORDERED:

16 4-24-2018

17 Dated: _____

18 

19 _____
20 UNITED STATES MAGISTRATE JUDGE
21
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23
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