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SERVICES, SHAY RIGGS-HORN and ASHLEY
DURROUGH

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRUCE WOLF, as Litigation Guardian Ad
Litem for C.A.R., D.O.B.: 1/19/2002, C.J.R.,
D.O.B.: 1/17/2005 and G.Y.R., D.O.B:
10/7/2006,

Plaintiffs,

vs.

CLARK COUNTY, SHAY RIGGS-HORN,
ASHLEY DURROUGH, TROY
ARMSTRONG AND JOHN AND JANE
DOES 1-10.

Defendants.

CASE NO. 2:17-cv-02084-JCM-NJK

**STIPULATION AND ORDER
TO EXTEND DEPOSITION DEADLINE
(Fifth Request)**

Pursuant to FRCP 6 and FRCP 26, the parties, by and through their respective counsel of record, hereby stipulate and agree to jointly move this Court for an Order to:

1. Extend the date for Defendants to depose Plaintiffs' experts from April 28, 2019 to May 31, 2019.

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1 2. Extend the date for rebuttal expert disclosures from May 28, 2019 to June 29,
2 2019.

3 **I. DISCOVERY COMPLETED**

4 Plaintiffs and Defendants have made initial and various supplemental witness and
5 document disclosures, exchanged written discovery and responded thereto, taken depositions,
6 Defendants have filed motions for summary judgment, and Plaintiffs have made partial initial
7 expert disclosures.
8

9 **II. GROUNDS FOR DISCOVERY EXTENSION:**

10 On January 8, 2019, this Court entered an Order (ECF No.132) establishing the
11 following expert discovery deadlines:

- 12 • Initial expert disclosure: February 26, 2019
- 13 • Defendants' expert disclosure: March 28, 2019
- 14 • Defendants' deadline to depose Plaintiff's experts: April 28, 2019
- 15 • Rebuttal expert deadline: May 28, 2019

16
17 On January 25, 2019, Plaintiffs' attorneys advised Defendants' attorney that their expert
18 – Jane Ramon – is only available for deposition in Massachusetts the week of February 11 to 15,
19 and the week of March 11 to 15. Ms. Ramon is unavailable from March 22 through to early
20 May. This Court's Order, supra, allowed Defendants' 30 days from their expert disclosure date
21 of March 28, 2019 to April 28, 2019, within which to depose Plaintiffs' experts. Ms. Ramon's
22 availability and unavailability interferes with the deadline set by this Court and deprives
23 Defendants of the time this Court allowed Defendants to complete Plaintiffs' expert depositions
24 through no fault on Defendants' part. Based on all of the above, the parties jointly are
25 requesting that only the two deadlines below be extended, by 33 days, as follows:
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1. Extend Defendants' deadline to depose Plaintiff's experts to May 31, 2019
2. Extend the rebuttal expert deadline to June 29, 2019

This request is being made well before 21 days before the expiration of the relevant deadlines and as soon as possible after Plaintiffs disclosed the expert issue to Defendants and the parties conferred about it. Local Rule 26-4 and Local Rule IA 6-1. There is good cause for the requested extension of two discovery deadlines due to Plaintiffs' expert's unavailability for a period of time. Id. Therefore, the parties hereby stipulate and request that this Court extend two of the expert discovery deadlines due to the special circumstances indicated above that support this request. In light of all of the above, the parties agree that in the interests of fairness and given this Court's Order, the expert's unavailability and the travel required for the expert's deposition, that there is good cause to extend the deadlines.

III. DISCOVERY THAT REMAINS TO BE COMPLETED:

Plaintiffs have made partial initial expert disclosures. However, they have until February 26, 2019 to complete their initial disclosures. Defendants have until March 28, 2019 to make their expert disclosures; and Defendants have until April 28, 2019 to take Plaintiffs' experts' depositions. The parties have until May 28, 2019 to make rebuttal expert disclosures.

IV. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

The parties have agreed to extend the following expert discovery deadlines, by 33 days, as set forth below:

1. Extend the date for Defendants to depose Plaintiffs' experts from April 28, 2019 to May 31, 2019.

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2. Extend the date for rebuttal expert disclosures from May 28, 2019 to June 28, 2019.

DATED: February 4th, 2019

DATED: February 4th, 2019

/s/ Justin L. Wilson, Esq.

/s/ Allen M. Ressler, Esq.

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DATED: February 4th, 2019.

/s/ Felicia Galati, Esq.

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Attorney for Defendants
CLARK COUNTY DEPARTMENT OF
FAMILY SERVICES, SHAY RIGGS-HORN,
and ASHLEY DURROUGH

ORDER

IT IS SO ORDERED this 5 day of February, 2019.



UNITED STATES MAGISTRATE JUDGE