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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 ANGELA ALLEN, individually,

CASE NO.: 2:17-cv-02204-APG-NJK

10 Plaintiff,

11 vs.

**STIPULATION FOR EXTENSION OF
 DISCOVERY DEADLINES (First Request)**

12 TARGET CORPORATION, a Foreign Corporation;
 DOES I – X, inclusive; and ROE
 13 CORPORATIONS I – X, inclusive,

14 Defendants.

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 16 The above named parties, by and through their respective counsel of record, hereby submit
 the following STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES (First Request).

17 **A. DISCOVERY COMPLETED TO DATE**

18 This matter involves a slip and fall at one of Defendant's stores. On September 20, 2017, the
 19 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and
 20 documents on September 18, 2017. Plaintiff served her initial disclosure of witnesses and
 21 documents on September 21, 2017. Plaintiff served her first supplemental disclosure of witnesses
 22 and documents on October 2, 2017. On September 27, 2017, the Court entered a Stipulated
 23 Discovery Plan/Scheduling Order.

24 On October 17, 2017, Defendant propounded a First Set of Interrogatories and First Set of
 25 Requests for Production of Documents upon Plaintiff. Plaintiff served her responses to those written
 26 discovery requests on November 20, 2017. On November 9, 2017, Plaintiff noticed the depositions
 27 of three of Defendant's current employees and the deposition of one of Defendant's former
 28 employees for November 28, 2017. The parties are attempting to schedule additional depositions of

1 Defendant's former and current employees.

2 Defendant has requested Plaintiff's medical records and films directly from her medical
3 providers through records authorizations provided by Plaintiff.

4 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

5 Defendant is still obtaining Plaintiff's medical records through authorizations provided by
6 Plaintiff. Defendant needs to conduct the deposition of Plaintiff, a witness who was with her at the
7 time of the subject incident, and at least two of Plaintiff's treating healthcare providers once
8 Defendant has received Plaintiff's medical records directly from the providers. Plaintiff continues to
9 experience symptoms she attributes to the subject incident and anticipates requiring future treatment
10 so Defendant believes it is premature to conduct those depositions. Defendant may seek to have
11 Plaintiff appear for a Rule 35 Examination.

12 Plaintiff has scheduled the depositions of four of Defendant's former and current employees
13 and intends to conduct the depositions of additional employees and representatives. The parties also
14 anticipate designating expert witnesses and conducting the depositions of any designated expert
15 witnesses.

16 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

17 Defendant is still in the process of obtaining Plaintiff's medical records and films. Defendant
18 needs to obtain those records before conducting the depositions of Plaintiff and her treating
19 healthcare providers. Defendant also needs to obtain those records and films to provide to
20 Defendant's medical expert. Also, Plaintiff continues to experience symptoms she attributes to the
21 subject incident and anticipates requiring future treatment for issues she attributes to the subject
22 incident. Plaintiff needs to conduct further depositions of Defendant's employees prior to the
23 disclosure of expert witnesses. All of this discovery cannot be completed and provided to expert
24 witnesses to allow them to complete expert reports prior to the current initial expert disclosure
25 deadline. Accordingly, the parties request a sixty day extension of the current discovery deadlines.

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D. PROPOSED DISCOVERY SCHEDULE

Close of Discovery:	April 14, 2018
Dispositive Motions:	May 14, 2018
Joint Pre-Trial Order:	June 13, 2018
Last day to amend pleadings:	Closed
Initial Expert Disclosures:	February 13, 2018
Rebuttal Expert Disclosures:	March 15, 2018
Interim Status Report	February 13, 2018

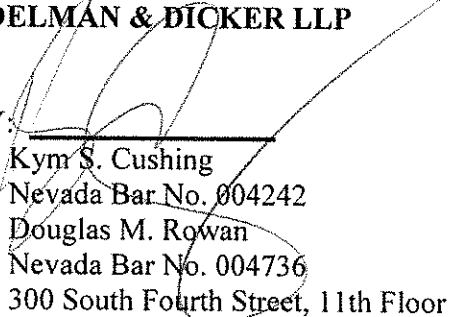
DATED this 29 day of November, 2017.

DATED this ___ day of November, 2017.

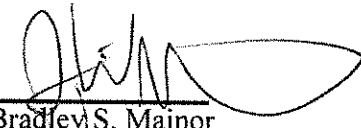
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IT IS SO ORDERED.

Dated this 29 day of November, 2017.



 UNITED STATES MAGISTRATE JUDGE