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 9 Attorneys for Defendant Property and Casualty Insurance  
 10 Company of Hartford

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 PATRICIA LOMBARDO,

14 Plaintiff,

15 vs.

16 PROPERTY AND CASUALTY INSURANCE  
 17 COMPANY OF HARTFORD; ALE  
 18 SOLUTIONS, INC; DOES I-1 and ROES 1-5,

19 Defendant.

No. 2:17-CV-02242-JCM-PAL

**STIPULATION TO EXTEND  
 DEADLINES**

**(SECOND REQUEST)**

20 Plaintiff Patricia Lombardo and defendant Property and Casualty Company of  
 21 Hartford hereby stipulate and request the Court to extend expert discovery, dispositive  
 22 motion, and pre-trial order deadlines in this case by 45 days, resulting in the following  
 23 changes:

- 24 • Expert discovery deadline will be extended from January 12, 2019 through and  
 including February 26, 2019;
- 25 • Dispositive motion deadline will be extended from February 11, 2019 through and  
 including March 28, 2019.
- 26 • Pre-trial order deadline will be extended from March 13, 2019 through and  
 including April 29, 2019.

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1 The parties recently mediated the case with Judge Pro. Although they were unable  
2 to reach a lump-sum settlement, the parties are working toward resolving this case by  
3 referring it to a binding, non-judicial appraisal process, but they need time to work out the  
4 parameters of the stipulated appraisal procedure. The parties would like to avoid the  
5 expenses associated with expert discovery and further trial preparation while they explore  
6 resolution.

7 The parties certify this stipulation was done in good faith and not for the purposes of  
8 delay.

9 DATED this 6<sup>th</sup> day of December 2018.

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11  
12 HAMILTON LAW LLC

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

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1 Having reviewed and considered the matter, the parties state that they recently unsuccessfully  
2 mediated this case, but are "working toward resolving this case by referring it to a binding, non-  
3 judicial appraisal process, but need more time to work out the parameters." They wish to avoid  
4 the expense with expert discovery and further preparation while they explore resolution, but have  
5 not provided any assurance that they have or will be able to reach a binding resolution before the  
6 expiration of the third extension of the discovery plan and scheduling order deadlines they  
7 propose. Accordingly,

8 **IT IS ORDERED** that the parties' Stipulation (ECF No. 34) is **DENIED without prejudice**.

9 **Dated:** December 21, 2018



Peggy A. Leen  
United States Magistrate Judge

### CERTIFICATE OF SERVICE

10 I hereby certify that I electronically transmitted the attached document to the Clerk's  
11 Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing  
12 to the following CM/ECF registrant:

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21 Attorneys for Plaintiff Patricia Lombardo

22 DATED this 6<sup>th</sup> day of December 2018.

23  
24 /s/ Elizabeth Linville

25 \_\_\_\_\_  
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