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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 Nita Taylor, individually;

10 Plaintiff,

11 vs.

12 Target Corporation; and DOES 1 through 100; and
13 ROE CORPORATIONS 101 through 200,

14 Defendants.

CASE NO.: [2:17-cv-02291-JCM-VCF](#)

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

15 The above named parties, by and through their respective counsel of record, hereby submit
16 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 29, 2017, the
19 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and
20 documents on September 28, 2017. Plaintiff served her initial disclosure of witnesses and
21 documents on September 29, 2017. On October 12, 2017, the Court entered a Stipulated Discovery
22 Plan/Scheduling Order.

23 On October 17, 2017, Defendant propounded a First Set of Interrogatories and First Set of
24 Requests for Production of Documents upon Plaintiff. Plaintiff served her responses to the
25 Interrogatories on November 15, 2017 and responses to the Requests for Production of Documents
26 on November 22, 2017. On October 12, 2017, Plaintiff propounded a First Set of Interrogatories and
27 First Set of Requests for Production of Documents upon Defendant. Plaintiff has granted Defendant
28 an extension to respond to those written discovery requests.

Defendant has requested Plaintiff's medical records and films directly from her medical

1 providers through records authorizations provided by Plaintiff.

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

3 Defendant still needs to respond to Plaintiff's written discovery requests. Defendant is still
4 obtaining Plaintiff's medical records through authorizations provided by Plaintiff. Defendant needs
5 to conduct the deposition of Plaintiff and at least three of Plaintiff's treating healthcare providers
6 once Defendant has received Plaintiff's medical records directly from the providers. Plaintiff
7 continues to experience symptoms she attributes to the subject incident and anticipates requiring
8 future treatment so Defendant believes it is premature to conduct some of those depositions.
9 Defendant may seek to have Plaintiff appear for a Rule 35 Examination.

10 Plaintiff anticipates conducting the depositions of Defendant's employees. The parties also
11 anticipate designating expert witnesses and conducting the depositions of any designated expert
12 witnesses.

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

14 Defendant is still in the process of obtaining Plaintiff's medical records and films. Defendant
15 needs to obtain those records before conducting the depositions of Plaintiff and her treating
16 healthcare providers. Defendant also needs to obtain those records and films to provide to
17 Defendant's medical expert.

18 The parties have discussed the possibility of early resolution of this matter, including the
19 potential scheduling of mediation. The parties would like to limit their expenses and conduct
20 mediation prior to engaging in further discovery, including the disclosure of expert witnesses. The
21 parties cannot schedule and conduct mediation, conduct additional discovery, and obtain reports
22 from expert witnesses prior to the current deadline for the disclosure of expert witnesses.
23 Accordingly, the parties request a sixty day extension of the current discovery deadlines.

24 ...

25 ...

26 ...

1 **D. PROPOSED DISCOVERY SCHEDULE**

2 Close of Discovery: April 27, 2018
3 Dispositive Motions: May 29, 2018
4 Joint Pre-Trial Order: June 28, 2018
5 Last day to amend pleadings: Closed
6 Initial Expert Disclosures: February 26, 2018
7 Rebuttal Expert Disclosures: March 28, 2018
8 Interim Status Report February 26, 2018

9 DATED this 8th day of December, 2017.

10 DATED this 8th day of December, 2017.

11 **WILSON, ELSER, MOSKOWITZ,**
12 **EDELMAN & DICKER LLP**

13 **BERNSTEIN & POISSON**

14 BY: /s/ Douglas Rowan

15 BY: /s/ Erik Bromson

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29 Attorney for plaintiff Nita Taylor

30 IT IS SO ORDERED. December

31 Dated this 12th day of _____, 2017.

32 
33 _____
34 **UNITED STATES MAGISTRATE JUDGE**

35 If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended
36 until 30 days after decision on the dispositive motions or further court order.