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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 Nita Taylor, individually;

9 Plaintiff,

10 vs.

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

12 Defendants.

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

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16 **STIPULATION FOR EXTENSION OF
DISCOVERY DEADLINES (Second
Request)**

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

20 **A. DISCOVERY COMPLETED TO DATE**

21 This matter involves a slip and fall at one of Defendant's stores. On September 29, 2017, the
22 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and
23 documents on September 28, 2017. Plaintiff served her initial disclosure of witnesses and
24 documents on September 29, 2017. On October 12, 2017, the Court entered a Stipulated Discovery
25 Plan/Scheduling Order. On December 12, 2017, the Court entered an order granting the parties first
26 request to extend the discovery deadlines.

27 On October 17, 2017, Defendant propounded a First Set of Interrogatories and First Set of
28 Requests for Production of Documents upon Plaintiff. Plaintiff served her responses to the
Interrogatories on November 15, 2017 and responses to the Requests for Production of Documents
on November 22, 2017. On October 12, 2017, Plaintiff propounded a First Set of Interrogatories and
First Set of Requests for Production of Documents upon Defendant. Defendant served its responses
to those written discovery requests on January 4, 2018.

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

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

4 Defendant is still obtaining Plaintiff's medical records through authorizations provided by
5 Plaintiff. Defendant needs to conduct the deposition of Plaintiff and at least three of Plaintiff's
6 treating healthcare providers once Defendant has received Plaintiff's medical records directly from
7 the providers. Plaintiff continues to experience symptoms she attributes to the subject incident and
8 anticipates requiring future treatment so Defendant may seek to have Plaintiff appear for a Rule 35
9 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 agreed to conduct a mediation in this matter before engaging in extensive
19 discovery, including the disclosure of expert witnesses. The first mutually agreeable date on which
20 the parties could schedule mediation is April 10, 2018, which is after the current deadline to disclose
21 expert witnesses. Accordingly, the parties request a sixty day extension of the current discovery
22 deadlines.

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D. PROPOSED DISCOVERY SCHEDULE

Close of Discovery: June 26, 2018
Dispositive Motions: July 26, 2018
Joint Pre-Trial Order: August 27, 2018
Last day to amend pleadings: Closed
Initial Expert Disclosures: April 27, 2018
Rebuttal Expert Disclosures: May 29, 2018
Interim Status Report April 27, 2018

DATED this 12th day of February, 2018.

DATED this 12th day of February, 2018.

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

BERNSTEIN & POISSON

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IT IS SO ORDERED.

Dated this 13th day of February, 2018

UNITED STATES MAGISTRATE JUDGE

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.