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9  
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 Nita Taylor, individually;

13 Plaintiff,

14 vs.

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

17 Defendants.

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

19 **STIPULATION FOR EXTENSION OF  
20 DISCOVERY DEADLINES (Second  
21 Request)**

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

25 **A. DISCOVERY COMPLETED TO DATE**

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

29 On October 17, 2017, Defendant propounded a First Set of Interrogatories and First Set of  
30 Requests for Production of Documents upon Plaintiff. Plaintiff served her responses to the  
31 Interrogatories on November 15, 2017 and responses to the Requests for Production of Documents  
32 on November 22, 2017. On October 12, 2017, Plaintiff propounded a First Set of Interrogatories and  
33 First Set of Requests for Production of Documents upon Defendant. Defendant served its responses  
34 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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1                   **D. PROPOSED DISCOVERY SCHEDULE**

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

9                   DATED this 12<sup>th</sup> day of February, 2018.

10                  DATED this 12<sup>th</sup> day of February, 2018.

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

13                  **BERNSTEIN & POISSON**

14                  BY: /s/Douglas M. Rowan  
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27                  *Attorney for plaintiff Nita Taylor*

28                  IT IS SO ORDERED.

29                  Dated this 13<sup>th</sup> day of February, 2018



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**UNITED STATES MAGISTRATE JUDGE**

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