

1 Douglas M. Rowan  
Nevada Bar No. 4736  
2 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
300 South Fourth Street, 11th Floor  
3 Las Vegas, Nevada 89101  
(702) 727-1400; FAX (702) 727-1401  
4 [douglas.rowan@wilsonelser.com](mailto:douglas.rowan@wilsonelser.com)  
*Attorneys for defendant Target Corporation*

5 **UNITED STATES DISTRICT COURT**

6 **DISTRICT OF NEVADA**

7 REBECCA MARTIN, an Individual;

8 Plaintiff,

9 v.

10 TARGET CORPORATION, a Foreign Corporation;  
11 YET UNKNOWN EMPLOYEE; DOES I through  
12 X, inclusive,

13 Defendants.

CASE NO.: 2:17-cv-02329-APG-NJK

**STIPULATED REQUEST FOR  
EXTENSION OF DISCOVERY  
DEADLINES (Third Request)**

14 The above named parties, by and through their respective counsel of record, hereby submit  
15 the following STIPULATED REQUEST FOR EXTENSION OF DISCOVERY DEADLINES  
16 (Third Request).

17 **A. DISCOVERY COMPLETED TO DATE**

18 This matter involves a slip and fall at one of defendant's stores. On October 10, 2017, the  
19 parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and  
20 documents on October 12, 2017. Plaintiff served her initial disclosure of witnesses and documents  
21 on October 10, 2017. On October 17, 2017, the Court entered a Stipulated Discovery  
22 Plan/Scheduling Order. On December 20, 2017, the Court entered an order granting the parties' first  
23 request to extend the discovery deadlines. On March 5, 2018, the Court entered an order granting  
24 the parties' second request to extend the discovery deadlines.

25 On October 17, 2017, defendant propounded a First Set of Interrogatories and First Set of  
26 Requests for Production of Documents upon plaintiff. Plaintiff served her responses to the  
27 Interrogatories on November 20, 2017 and responses to the Requests for Production of Documents  
28 on November 28, 2017. On October 30, 2017, plaintiff propounded a First Set of Requests for  
Production of Documents upon defendant. On November 22, 2017, plaintiff propounded a Second

1 Set of Requests for Production of Documents upon defendant. Defendant served its responses to the  
2 First Set of Requests for Production of Documents on January 19, 2018 and served its responses to  
3 the Second Set of Requests for Production of Documents on January 26, 2018.

4 Plaintiff conducted the deposition of one of defendant's former employees on March 12,  
5 2018. Plaintiff was unable to serve another one of defendant's former employee with a subpoena  
6 and vacated that deposition. Plaintiff conducted the deposition of a 30(b)(6) representative of  
7 defendant regarding four issues on March 26, 2018. Plaintiff conducted the deposition of one of  
8 defendant's current employees on May 17, 2018. Plaintiff scheduled the deposition of a 30(b)(6)  
9 representative of defendant regarding two additional issues for June 11, 2018. Plaintiff agreed to  
10 reschedule that deposition as Defendant is in the process of substituting counsel.

11 The parties served initial expert witness disclosures on May 4, 2018. Defendant served a  
12 supplemental expert witness disclosure on June 5, 2018.

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

14 Defendant needs to conduct the deposition of plaintiff and up to four of plaintiff's healthcare  
15 providers. Plaintiff has scheduled the deposition of defendant's 30(b)(6) representative regarding  
16 two additional topics. Plaintiff may also conduct the depositions of additional employees and  
17 representatives. The parties also anticipate conducting the depositions of designated expert  
18 witnesses.

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

20 Defendant is in the process of substituting counsel in this matter. That substitution of  
21 counsel has delayed the scheduling and completion of the remaining depositions as new counsel  
22 becomes familiar with this matter and the parties schedule the depositions based upon new counsel's  
23 availability.

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Accordingly, the parties request a thirty day extension of the current discovery deadlines.

**D. PROPOSED DISCOVERY SCHEDULE**

Close of Discovery:	August 2, 2018
Dispositive Motions:	September 4, 2018
Joint Pre-Trial Order:	October 4, 2018
Last day to amend pleadings:	Closed
Initial Expert Disclosures:	Closed
Rebuttal Expert Disclosures:	Closed
Interim Status Report	Closed

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

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

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

**THE GALLIHER LAW FIRM**

BY: /s/Douglas M. Rowan

BY: /s/Keith E. Galliher

Douglas M. Rowan  
Nevada Bar No. 004736  
300 South Fourth Street, 11th Floor  
Las Vegas, Nevada 89101  
*Attorneys for defendant Target Corporation*

Keith E. Galliher, Jr.  
Nevada Bar No. 000220  
1850 East Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
*Attorney for plaintiff Rebecca Martin*

IT IS SO ORDERED.

**NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

Dated June 13 \_\_\_\_\_, 2018



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**UNITED STATES MAGISTRATE JUDGE**