

1 Elayna J. Youchah  
Nevada State Bar No. 5837  
2 Donald P. Paradiso  
Nevada State Bar No. 12845  
3 **JACKSON LEWIS P.C.**  
3800 Howard Hughes Pkwy, Suite 600  
4 Las Vegas, Nevada 89169  
Tel: (702) 921-2460  
5 Email: youchahe@jacksonlewis.com  
Email: donald.paradiso@jacksonlewis.com

6 Attorneys for Defendant  
7 Ramparts, Inc. dba Luxor Hotel & Casino

8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARIA MENDEZ DE QUINONEZ,

12 Plaintiff,

13 vs.

14 RAMPARTS INC., d/b/a LUXOR HOTEL &  
CASINO,

15 Defendants.  
16

Case No. 2:17-cv-02394-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY AND  
DISPOSITIVE MOTION DEADLINES**

**(First Request)**

17 The parties, by and through their respective counsel of record, hereby stipulate and agree  
18 as follows:

19 1. On December 15, 2017, this Court entered an Order granting the Stipulated  
20 Discovery Plan and Scheduling Order submitted by the parties.

21 2. This is the first request by the parties to amend the Court's December 15, 2017  
22 Scheduling Order.

23 3. The parties stipulate and agree to extend the discovery deadline for thirty (30) days  
24 from May 14, 2018 up to and including June 13, 2018, for the sole purpose of allowing the parties  
25 to complete deposition discovery. All written discovery must be served such that responses are  
26 due no later than May 14, 2018.

1           4.       The parties further agree to extend the due date for dispositive motions to thirty  
2 (30) days after the proposed new close of discovery.

3                           **STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED**

4           The parties have been diligently pursuing discovery. To date, they have exchanged initial  
5 disclosures, including relevant documents. In addition, the parties have exchanged written  
6 document requests and interrogatories.

7           Plaintiff served the following disclosures:

- 8                   a.       Initial Disclosures on November 29, 2017;
- 9                   b.       First Supplemental Disclosures on December 19, 2017.

10          Defendant served the following disclosures:

- 11                  a.       Initial Disclosures on November 29, 2017;
- 12                  b.       First Supplemental Disclosures on March 8, 2018.

13          Plaintiff served the following discovery requests:

- 14                  a.       First Set of Request for Production of Documents. Defendant responded  
15 on February 7, 2018.
- 16                  b.       First Set of Interrogatories. Defendant responded on February 7, 2018.
- 17                  c.       Plaintiff has identified five deposition she seeks to complete.

18          Defendant served the following discovery requests:

- 19                  a.       First Set of Interrogatories. Plaintiff's response is due on March 30, 2018.
- 20                  b.       First Set of Request for Production of Documents. Plaintiff's response is  
21 due on March 30, 2018.
- 22                  c.       Defendant has set Plaintiff's deposition for May 9, 2018.

23                           **STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED**

24          The parties are currently in the process of scheduling depositions. To accommodate  
25 counsel, including third party deponents' schedules, the parties seek until June 13, 2018 to ensure  
26 completion of these depositions. For the above stated reasons, the parties request that the  
27 deadline to complete depositions be extended for thirty (30) days from May 14, 2018 to June 13,  
28 2018.

1 **PROPOSED SCHEDULE**

2 The parties stipulate and agree that:

3 1. **Discovery**: The discovery period shall be extended thirty (30) days from May 14,  
4 2018 to June 13, 2018, for the sole purpose of allowing the parties to complete deposition  
5 discovery. All written discovery must be served such that responses are due no later than May 14,  
6 2018.

7 2. **Dispositive Motions**: The dispositive motions deadline shall be extended thirty  
8 (30) days from June 13, 2018 to July 13, 2018.

9 4. **Pre-Trial Order**: If no dispositive motions are filed, the Joint Pretrial Order shall  
10 be filed thirty (30) days after the date set for the filing of dispositive motions, which is August 13,  
11 2018. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be  
12 suspended until thirty (30) days after decision on the dispositive motions or by further order of the  
13 Court.

14 This stipulation and order is sought in good faith and not for the purpose of delay. No  
15 prior request for any extension of scheduling deadlines has been made.

16 DATED this 30th day of March, 2018.

17 KEMP & KEMP

JACKSON LEWIS P.C.

18 /s/ James P. Kemp

/s/ Elayna J. Youchah

19 James P. Kemp, NV Bar No. 6375  
20 Victoria L. Neal, NV Bar No. 13382  
7435 W. Azure Drive, Suite 110  
Las Vegas, Nevada 89130

Elayna J. Youchah, NV Bar No. 5837  
Donald P. Paradiso, NV Bar No. 12845  
3800 Howard Hughes Parkway, Ste. 600  
Las Vegas, Nevada 89169

21 Attorneys for Plaintiff  
22 Maria Mendez De Quinonez

Attorneys for Defendant  
Ramparts, Inc. dba Luxor Hotel Casino

23 **ORDER**

24 IT IS SO ORDERED.

25  
26   
United States District/Magistrate Judge

27 Date: April 6, 2018