

**NETTLES LAW FIRM**

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 YVONN HEDMAN, an individual,  
13  
14 **Plaintiff,**

CASE NO. 2:17-cv-02559-JAD-NJK

15 vs.

**STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY DEADLINE**  
**DATES (FIRST REQUEST)**

16 ALBERTSON'S, LLC, a Foreign Limited  
17 Liability Company; DOE INDIVIDUALS 1  
18 through 10; ROE CORPORATIONS 11  
19 through 20; and ABC LIMITED LIABILITY  
COMPANIES 21 through 30, inclusive,  
20 **Defendants.**

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23 COME NOW, Plaintiff YVONN HEDMAN, by and through her attorneys BRIAN D.  
24 NETTLES, ESQ., and WILLIAM R. KILLIP, JR., ESQ., and JENNIFER A. PETERSON, ESQ.,  
25 of the NETTLES LAW FIRM; and Defendant ALBERTSON'S, LLC, by and through its  
26 attorneys LEW BRANDON, JR., ESQ., and MATTHEW WHITTAKER, ESQ., of MORAN  
27 BRANDON BENDAVID MORAN, and hereby submit the following Stipulation pursuant to  
28 Local Rule 26-4. Based upon the following, the Parties request this Court extend all discovery

1 deadlines by sixty (60) days. This request is made in good faith and not to unduly delay the  
2 proceedings.

3 **I. Local Rule 6-1**

4 Under LR 6-1(b) every stipulation to extend time must inform the court of any previous  
5 extensions granted and state the reason for the extension requested.

6 **a. The Requirement of Local Rule 6-1 Are Satisfied**

7 This is the first request for extension filed by the parties. The parties are seeking this  
8 extension in order to complete additional discovery that could not be completed during the time  
9 allotted.

10 **II. Local Rule 26-4(a)**

11 Under LR 26-4(a) a statement specifying the Discovery completed:

- 12 a. Initial disclosures have been exchanged between all parties;
- 13 b. Written discovery has been expedited;
- 14 c. Defendant has scheduled the Custodian of Records Depositions for January 5, 2018,  
15 at 8:00 a.m. for the following treating providers:
  - 16 1. St. Rose Dominican Hospital – Rose De Lima Campus;
  - 17 2. Fremont Emergency Services;
  - 18 3. Radiology Associates of Nevada;
  - 19 4. Advanced Pain Management;
  - 20 5. ATI Physical Therapy;
  - 21 6. Valley View Surgery Center;
  - 22 7. Steinberg Diagnostic Medical Imaging Centers;
  - 23 8. United Toxicology, LLC
  - 24 9. Next Step Medical;
  - 25 10. Advanced Orthopedics and Sport Medicine; and
  - 26 11. Parkway Surgery Center.

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- d. Defendant has scheduled Plaintiff’s Deposition for January 17, 2018;
- e. Plaintiff has scheduled the deposition of Maria Ramirez, Defendant’s employee, for February 6, 2018 at 10:00 a.m.; and
- f. Plaintiff has scheduled the deposition of witness Marsha Prince for February 6, 2018, at 1:00 p.m.

**III. Local Rule 26-4(b)**

Under LR 26-4(b) a specific description of the Discovery that remains to be completed:

- a. The remaining Discovery to be completed is Plaintiff’s deposition, FRCP 30(b)(6) depositions of Defendant, Deposition of Defendant’s employees, depositions of treating physicians, and disclosure and depositions of the experts.

**IV. Local Rule 26-4(c)**

Under LR 26-4(c) the reasons why Discovery remaining was not completed within the time limits set by the Discovery Plan:

- a. Due to various scheduling conflicts, it has been impossible to conduct depositions which must be completed prior to the disclosure of experts. Additionally, Plaintiff’s counsel has a trial in District Court, scheduled for January 22, 2018 (*Zavala vs. Quesada*; Case No. A-14-699223-C), which will limit the parties’ ability to reschedule depositions prior to the expert disclosure deadline.

**V. Local Rule 26-4(d)**

Under LR 26-4(d) a proposed schedule for completing all remaining Discovery:

- a. Discovery cutoff dates:
  - Current date: March 30, 2018
  - Proposed date: May 29, 2018
- ~~b. Amending the Pleadings and Adding Parties:~~
  - ~~Current date: December 29, 2017~~
  - ~~Proposed date: February 27, 2018~~

**DENIED.** See Local Rule 26-4.

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- c. Disclosures of Experts:
  - i. Initial expert disclosures:
    - Current date: January 29, 2018
    - Proposed date: March 30, 2018
  - ii. Rebuttal expert disclosures:
    - Current date: February 28, 2018
    - Proposed date: April 30, 2018
- d. Interim Status Report:
  - Current date: January 29, 2018
  - Proposed date: March 30, 2018
- e. Dispositive Motions:
  - Current date: April 30, 2018
  - Proposed date: June 29, 2018
- f. Joint Pre-Trial Order:
  - Current date: May 30, 2018
  - Proposed date: July 30, 2018

Therefore, good cause existing, counsel jointly request that this Honorable Court allow them the above proposed extended Discovery dates.

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

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

NETTLES LAW FIRM

MORAN BRANDON BENDAVID MORAN

By: /s/ Jennifer A. Peterson  
JENNIFER A. PETERSON, ESQ.  
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*Attorney for Plaintiff*

By: /s/ Matthew Whittaker  
MATTHEW WHITTAKER, ESQ.  
Nevada Bar No. 13281  
630 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorney for Defendant*

**ORDER**

Upon stipulation of counsel and good cause appearing therefore:

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IT IS HERBY ORDERED that the *Stipulation and Order to Extend Discovery Deadline Dates (First Request)* is hereby approved , except as to the deadline to amend.

DATED January 10 \_\_\_\_\_, 2018.

  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

NETTLES LAW FIRM

By: /s/ Jennifer A. Peterson  
JENNIFER A. PETERSON, ESQ.  
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