

NETTLES LAW FIRM

1389 Galleria Drive Suite 200
Henderson, NV 89014
(702) 434-8282 / (702) 434-1488 (fax)

1 BRIAN D. NETTLES, ESQ.
Nevada Bar No. 7462
2 WILLIAM R. KILLIP, JR., ESQ.
Nevada Bar No. 3660
3 JENNIFER A. PETERSON, ESQ
Nevada Bar No. 11242
4 NETTLES LAW FIRM
5 1389 Galleria Drive, Suite 200
Henderson, Nevada 89014
6 Telephone: (702) 434-8282
7 Facsimile: (702) 434-1488
brian@nettlslawfirm.com
8 bill@nettlslawfirm.com
9 jennifer@nettlslawfirm.com
Attorneys for Plaintiff

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 (SECOND 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.**

21
22 COME NOW, Plaintiff YVONN HEDMAN, by and through her attorneys BRIAN D.
23 NETTLES, ESQ., and WILLIAM R. KILLIP, JR., ESQ., and JENNIFER A. PETERSON, ESQ.,
24 of the NETTLES LAW FIRM; and Defendant ALBERTSON'S, LLC, by and through its
25 attorneys LEW BRANDON, JR., ESQ., and MATTHEW WHITTAKER, ESQ., of MORAN
26 BRANDON BENDAVID MORAN, and hereby submit the following Stipulation pursuant to
27 Local Rule 26-4. Based upon the following, the Parties request this Court extend all discovery
28

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 Deposition of Plaintiff March 26, 2018 at 11:00 a.m.;
- 15 and
- 16 d. Plaintiff are attempting to locate and depose Marsha Prince, former employee of
17 Defendant.

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

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

- 20 a. The remaining Discovery to be completed is Plaintiff's deposition, FRCP 30(b)(6)
21 depositions of Defendant, Deposition of Defendant's former employee, Marsha
22 Prince, depositions of treating physicians, and disclosure and depositions of the
23 experts.

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

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

- 27 a. Due to various scheduling conflicts, it has been impossible to conduct depositions
28 which must be completed prior to the disclosure of experts. Defendant unilaterally

1 noticed Plaintiff's depo for January 17, 2018; however, due to Plaintiff's counsel's
2 trial calendar in January 2018, said deposition was continued to February 15, 2018.
3 On February 15, 2018 all Parties appeared for Plaintiff's deposition but due to no
4 fault of either party, a court reporter did not show up to the deposition and the court
5 reporting service could not find an available reporter to send, at which point the
6 Parties agreed to continue Plaintiff's Deposition. Due to further scheduling conflict,
7 the deposition could not be scheduled again until March 26, 2018 which is only four
8 (4) days before the current expert deadline. Accordingly, the parties need more time
9 for initial expert reports.

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

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

12 a. Discovery cutoff dates:

13 Current date: May 29, 2018

14 Proposed date: July 30, 2018

15 b. Amending the Pleadings and Adding Parties:

16 Current date: December 29, 2017

17 Proposed date: No extension sought

18 c. Disclosures of Experts:

19 i. Initial expert disclosures:

20 Current date: March 30, 2018

21 Proposed date: May 29, 2018

22 ii. Rebuttal expert disclosures:

23 Current date: April 30, 2018

24 Proposed date: June 29, 2018

25 d. Interim Status Report:

26 Current date: March 30, 2018

27 Proposed date: May 29, 2018

28 ...

NETTLES LAW FIRM

1389 Galleria Drive Suite 200
Henderson, NV 89014
(702) 434-8282 / (702) 434-1488 (fax)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Upon stipulation of counsel and good cause appearing therefore:

IT IS HERBY ORDERED that the *Stipulation and Order to Extend Discovery Deadline Dates (Second Request)* is hereby approved. **NO FURTHER EXTENSIONS WILL BE GRANTED.**

DATED March 12 _____, 2018.



UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

NETTLES LAW FIRM

By: /s/ Brian D. Nettles
BRIAN D. NETTLES, ESQ.
Nevada Bar No. 7462
1389 Galleria Drive, Suite 200
Henderson, Nevada 89014
Attorney for Plaintiff