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8
 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 DANITA DAILEY-ADAMS, individually,

Case No. 2:17-cv-02602-GMN-GWF

12 Plaintiffs,

13 vs.

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES
 (FIRST REQUEST)**

14 ALBERTSON'S LLC; DOES I through X;
 15 inclusive; ROE BUSINESS ENTITIES I
 through X, inclusive,

16 Defendants.

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 18 In accordance with Local Rules of Practice for the United States District Court for the
 19 District of Nevada ("LR") 26-4, Defendant Albertson's LLC ("Defendant"), by and through its
 20 counsel of record, BACKUS, CARRANZA & BURDEN, and Plaintiff Danita Dailey-Adams
 21 ("Plaintiff"), by and through her counsel of record, BERTOLDO BAKER CARTER & SMITH, hereby
 22 stipulate and agree to an extension of all remaining discovery deadlines by ninety (90) days. The
 23 parties propose the following revised discovery plan:

24 **DISCOVERY COMPLETED TO DATE**

25 The parties conducted an Initial Disclosure Conference pursuant to LR 26-1 and Fed. R.

1 Civ. P. 26(f) on November 28, 2017. In December 2017, the parties served their initial
2 disclosure of documents and the names of individuals with knowledge of the facts pertaining to
3 the claims set forth in this matter pursuant to Fed. R. Civ. P. 26(a)(1). On February 28, 2018,
4 Defendant propounded interrogatories and requests for production of documents upon Plaintiff.
5 On March 29, 2018, Plaintiff responded to Defendant's written discovery requests.

6 **DISCOVERY TO BE COMPLETED**

7 The parties will propound additional written discovery. Deposition of Plaintiff,
8 representatives of Defendant, and other percipient witnesses remain to be taken. Defendant also
9 anticipates deposing Plaintiff's medical providers. The parties are also expected to disclose and
10 depose experts.

11 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

12 A discovery extension is needed in this case because Plaintiff has only recently
13 completed her surgery which caused delay to her deposition and the depositions of her treating
14 physicians. Thus, the parties respectfully request a ninety (90) day extension of the remaining
15 discovery deadlines as detailed below. This request is made in good faith and not for the purpose
16 of delay.

17 **PROPOSED NEW DISCOVERY DEADLINES**

18 **Deadline to Amend Pleadings/Add Parties:**

19 Currently: March 27, 2018
Proposed: N/A

20 **Interim Status Report:**

21 Currently: April 26, 2018
Proposed: July 25, 2018

22 **Initial Expert Disclosure Deadline:**

23 Currently: April 26, 2018
Proposed: July 25, 2018

24 **Rebuttal Expert Disclosure Deadline:**

25 Currently: May 28, 2018

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Proposed: August 27, 2018

Discovery Deadline:

Currently: June 25, 2018
Proposed: September 24, 2018

Deadline to File Dispositive Motions:

Currently: July 25, 2018
Proposed: October 23, 2018

Pre-Trial Order Deadline:

Currently: August 24, 2018
Proposed: November 22, 2018

DATED: April 17, 2018

DATED: April 17, 2018

BACKUS, CARRANZA & BURDEN

BERTOLDO BAKER CARTER & SMITH

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ORDER

IT IS SO ORDERED.

DATED: this 18th day of April 2018



UNITED STATES MAGISTRATE JUDGE