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8 *Attorneys for Defendant*  
 9 *Wal-Mart Stores, Inc.*

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

12 SADIYYAH ABDULLAH,  
 13  
 Plaintiff,  
 14 v.  
 15 WAL-MART STORES INC.; DOES I-X,  
 inclusive, and ROE CORPORATIONS I-X,  
 16 inclusive,  
 17 Defendants.

Case No.: 2:17-cv-02647-GMN-VCF

**SECOND AMENDED STIPULATION**  
**AND ORDER TO EXTEND DISCOVERY**  
**DEADLINES**

**[FIRST REQUEST]**

19 Plaintiff SADIYYAH ABDULLAH (hereinafter "Plaintiff") and Defendant WAL-MART  
 20 STORES, INC. (hereinafter "WALMART" or "Defendant"), by and through their respective counsel  
 21 of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and  
 22 discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

23 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery  
 24 extension requested in this matter.

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1 **DISCOVERY COMPLETED TO DATE**

- 2 • The parties have conducted an FRCP 26(f) conference and have served their respective FRCP  
3 26(a) disclosures;
- 4 • Plaintiff has served upon Defendant one sets of Requests for Production, one set of  
5 Interrogatories and one set of Requests for Admissions. Defendant is in the process of  
6 responding to said Requests.
- 7 • Defendant has served upon Plaintiff one set of Requests for Production, one set of  
8 Interrogatories and one set of Requests for Admissions. Plaintiff has submitted timely  
9 responses to first written discovery;

10 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

11 Discovery to be completed includes:

- 12 • Plaintiff's IME with Defendant's expert physicians;
- 13 • Additional written discovery (if necessary);
- 14 • Depositions of fact witnesses;
- 15 • Depositions of Plaintiff's treating physicians;
- 16 • Depositions of expert witnesses and rebuttal expert witnesses;
- 17 • Defendant's 30(b)(6) witness deposition;
- 18 • Inspection of the subject premises (if necessary).

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20 The parties aver, pursuant to Local Rule 6-1, that good cause exists for their requested extension of  
21 current discovery because Defendant's 30(b)(6) witness will be taken after January 3, 2017, as Walmart is  
22 currently in its holiday blackout period. Further, the parties anticipate a greater likelihood that they will  
23 be able to negotiate a resolution of this case prior to incurring fees and costs for pre- trial preparation.

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**[PROPOSED] NEW DISCOVERY DEADLINES**

|  |   |   |   |   |                       |
|--|---|---|---|---|-----------------------|
| <b>Expert Disclosure Deadline</b>          | . | . | . | . | <b>March 20, 2018</b> |
| <b>Joint Interim Status Report</b>         | . | . | . | . | <b>March 20, 2018</b> |
| <b>Rebuttal Expert Disclosure Deadline</b> | . | . | . | . | <b>April 20, 2018</b> |
| <b>Discovery Cut-Off Date</b>              | . | . | . | . | <b>May 21, 2018</b>   |
| <b>Dispositive Motion Deadline</b>         | . | . | . | . | <b>June 19, 2018</b>  |
| <b>Proposed Joint Pre-Trial Order</b>      | . | . | . | . | <b>July 17, 2018</b>  |

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 15<sup>TH</sup> day of December, 2017.

DATED this 15<sup>th</sup> day of December, 2017.

*/s/ David M. Menocal*

*/s/ Betsy C. Jefferis*

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*Attorneys for Plaintiff  
Sadiyyah Abdullah*

*Attorneys for Defendant  
Wal-Mart Store, Inc.*

**IT IS SO ORDERED:**

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

  
\_\_\_\_\_  
**UNITED STATES MAGISTRATE JUDGE**

12-18-2017  
**DATED:** \_\_\_\_\_

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm PHILLIPS,  
3 SPALLAS & ANGSTADT, LLC, and that on this 15<sup>th</sup> day of December, 2017, I electronically served  
4 a copy of **SECOND AMENDED STIPULATION AND ORDER TO EXTEND DISCOVERY**  
5 **DEADLINES [FIRST REQUEST]** as follows:

- 6  By facsimile addressed to the following counsel of record, at the address listed below;  
7  By placing same to be deposited for mailing in the United States Mail, in a sealed envelope  
8 upon which first class postage was prepaid in Las Vegas, Nevada;  
9  By Hand Delivery (ROC); and/or  
10  By Electronic Service through CM/ECF to:

11

| ATTORNEY OF RECORD   | TELEPHONE/FAX                          | PARTY     |
|--|--|-----------|
| Alex J. De Castroverde<br>Nevada Bar No. 6950<br>Orlando De Castroverde<br>Nevada Bar No. 7320<br>DE CASTROVERDE LAW GROUP<br>1149 S. Maryland Pkwy<br>Las Vegas, NV 89104 | Phone 702-383-0606<br>Fax 702-383-8741 | Plaintiff |

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15  
16 */s/ Betsy C. Jefferis*

17  
18 An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC