

1 Michael Kind, Esq. (SBN: 13903)
 2 **KAZEROUNI LAW GROUP, APC**
 3 6069 S. Fort Apache Rd., Ste. 100
 4 Las Vegas, NV 89148
 5 Phone: (800) 400-6808 x7
 6 Fax: (800) 520-5523
 7 mkind@kazlg.com

8 David H. Krieger, Esq. (SBN: 9086)
 9 **HAINES & KRIEGER, LLC**
 10 8985 S. Eastern Avenue, Ste. 350
 11 Henderson, NV 89123
 12 Phone: (702) 880-5554
 13 Fax: (702) 385-5518
 14 Email: dkrieger@hainesandkrieger.com

15 Matthew I. Knepper, Esq. (Nevada Bar No. 12796)
 16 Miles N. Clark, Esq. (Nevada Bar No. 13848)
 17 **KNEPPER & CLARK LLC**
 18 10040 W. Cheyenne Ave., 170-109
 19 Las Vegas, NV 89129
 20 Phone: (702) 825-6060
 21 Fax: (702) 447-8048
 22 matthew.knepper@knepperclark.com
 23 miles.clark@knepperclark.com
 24 *Attorneys for Plaintiff Wayne Williams*

25 **UNITED STATES DISTRICT COURT**
 26 **DISTRICT OF NEVADA**

27 Wayne Williams,

28 Plaintiff,

v.

Equifax Information Services LLC
 and Trans Union LLC,

Defendants.

Case No. 2:17-cv-02812-GMN-GWF

**Joint Stipulation and Order to
 Extend Discovery**

(First Request)

1 Plaintiffs Wayne Williams (collectively, “Plaintiffs”) and Trans Union LLC
2 (“Defendant” and together with Plaintiff as the “Parties”) by and through their
3 counsel of record hereby stipulate to modify the Court’s Order, ECF No. 17, to
4 extend:

- 5 (1) the last date to disclose experts from April 6, 2018, to **June 6, 2018**
- 6 (2) the last date to disclose rebuttal experts from May 7, 2018, to **July 6, 2018**
- 7 (3) the last date to complete discovery from June 5, 2018, to **August 6, 2018;**
- 8 (4) the last date to file dispositive motions from July 5, 2018, to **September**
9 **5, 2018;** and
- 10 (5) the last date to file the proposed joint pretrial order from August 6, 2018,
11 to **October 8, 2018.**

12 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The
13 Parties have diligently pursued discovery. Plaintiff has propounded written
14 discovery requests and is continuing to meet and confer with Trans Union regarding
15 certain documents withheld. The Parties ran into scheduling conflicts with Trans
16 Union’s Rule 30(b)(6) witness and Plaintiff has noticed Trans Union’s deposition
17 for April 20, 2018. Trans Union has noticed Plaintiff’s deposition for April 3, 2018.
18 Furthermore, the Parties are actively discussing resolution of this case. This request
19 for extension of deadlines is made specifically in this fee-shifting matter since the
20 taking of depositions are a significant expense. The Parties ran into limitations
21 based on the availability of the Parties for deposition and therefore seek to extend
22 the expert disclosures deadlines and the corresponding discovery deadlines.

23 Pursuant to LR 26-4(a), Plaintiff has propounded written discovery requests
24 upon all defendants, Trans Union has propounded discovery on Plaintiff. Trans
25 Union noticed Plaintiff’s depositions and Plaintiff has noticed Trans Union’s
26 deposition.
27
28

1 Pursuant to LR 26-4(b), the Parties request additional time to continue to meet
2 and confer about discovery disputes, conduct depositions and disclose experts, as
3 necessary.

4 Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

- 5 (1) the last date to disclose experts shall be **June 6, 2018**
6 (2) the last date to disclose rebuttal experts shall be **July 6, 2018**
7 (3) the last date to complete discovery shall be **August 6, 2018**;
8 (4) the last date to file dispositive motions shall be **September 6, 2018**; and
9 (5) the last date to file the proposed joint pretrial order shall be **October 8,**
10 **2018.**

11 For these reasons, the Parties jointly request that this Court modify the
12 Scheduling Order to provide an additional 60 days to complete discovery, and the in
13 the ordinary course file dispositive motions, and the proposed joint pretrial order as
14 described in the proposed timeline above.

15 ///

16 ///

17 ///

18

19

20

21

22

23

24

25

26

27

28

1 This is the Parties' first request for an extension of these deadlines.
2 DATED this 30th day of March 2018.

3 **KAZEROUNI LAW GROUP, APC**

LEWIS BRISBOIS BISGAARD

4 By: /s/ Michael Kind
5 Michael Kind, Esq.
6 6069 S. Fort Apache Rd., Ste 100
7 Las Vegas, NV 89148
Attorneys for Plaintiff

By: /s/ Jason G. Revzin
Jason G. Revzin, Esq.
Monica F. Ramirez, Esq.
6385 S. Rainbow Blvd., Ste. 600
Las Vegas, NV 89118
Attorneys for Trans Union LLC

8
9 **ORDER**

10 IT IS HEREBY ORDERED that the Order, ECF No 17, is modified to extend
11 the discovery deadlines as follows:

- 12 (1) the last date to disclose experts shall be **June 6, 2018**
13 (2) the last date to disclose rebuttal experts shall be **July 6, 2018**
14 (3) the last date to complete discovery shall be **August 6, 2018**;
15 (4) the last date to file dispositive motions shall be **September 6, 2018**; and
16 (5) the last date to file the proposed joint pretrial order shall be **October 8,**
17 **2018.**

18 IT IS SO ORDERED.

19 
20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 Dated: 4/2/2018
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 30, 2018, the foregoing stipulations was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148

KAZEROUNI LAW GROUP, APC
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148

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