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

10 MILLICENT WANJOHI,
 11 Plaintiff,

12 vs.

13 GEICO GENERAL INSURANCE
 14 COMPANY; DOE INDIVIDUALS I-X,
 inclusive; and ROE CORPORATIONS I-X,
 15 inclusive,

16 Defendants.
 17

CASE NO.: 2:17-CV-02902-GMN-VCF

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

18 The parties hereto, by and through their undersigned counsel of record, hereby stipulate
 19 to extend the time for discovery in this matter. This is the first request for such extension.

20 **I.**

21 **CURRENT SCHEDULING ORDER DATES**

22 Plaintiff's case has not yet been set for a jury trial. The current discovery deadlines are
 23 based off of a stipulated discovery plan, which was submitted in compliance with LR 26-1(e) on
 24 January 12, 2018. A scheduling order, based on this plan, was entered on January 16, 2018.

25 Pursuant to this order, the current discovery deadline dates are:

- 26 • Fed. R. Civ. P. 26(a)(1) Initial Disclosures: January 29, 2018
- 27 • Final Date to Amend Pleadings or Add Parties: February 12, 2018
- 28 • Final Date for Initial Expert Disclosures: March 12, 2018

1 meaningful discovery. The Parties further expect that thorough and meaningful discovery may
2 lead to a breakthrough regarding alternative dispute resolution possibilities.

3 **V.**

4 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

5 Based on the foregoing, the Parties respectfully request that this Court grant a five-week
6 extension of the remaining discovery deadlines, except for the final date to amend pleadings or
7 add parties, which is less than 21 days from now (see LR 26-4). This would result in the
8 following deadlines:

- 9 • Final Date to Amend Pleadings or Add Parties: February 12, 2018
- 10 • Final Date for Initial Expert Disclosures: April 16, 2018
- 11 • Final Date for Rebuttal Expert Disclosures: May 21, 2018
- 12 • Close of Discovery: June 18, 2018
- 13 • Final Date for Dispositive Motions: July 16, 2018
- 14 • Final Date for Pretrial Order: August 13, 2018

15 Dated this 7th of February, 2018.

Dated this 7th of February, 2018.

16 RICHARD HARRIS LAW FIRM

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18 /s/ Ian C. Estrada
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24 **IT IS SO ORDERED.**

25 Dated this 12th of February, 2018.

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


UNITED STATES MAGISTRATE JUDGE