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

| | | | |
|----|--------------------------------------|---|---|
| 9 | PAMELA DITTMAR, |) | Case No. 2:17-cv-02916-JAD-BNW |
| 10 | |) | |
| | Plaintiff, |) | <u>JOINT STIPULATION AND ORDER</u> |
| 11 | |) | <u>TO STAY PROCEEDINGS FOR</u> |
| | vs. |) | <u>SIXTY DAYS</u> |
| 12 | |) | |
| | CITY OF NORTH LAS VEGAS, a municipal |) | (Second Request) |
| 13 | corporation, |) | |
| | |) | |
| 14 | Defendant. |) | |
| | |) | |

15 Plaintiff Pamela Dittmar (“Plaintiff”), by and through her counsel, Melanie Hill Law PLLC,
 16 and Defendant City of North Las Vegas (“Defendant”), by and through its counsel, Kamer Zucker
 17 Abbott, stipulate and request that the Court stay these proceedings for sixty (60) days, through and
 18 including May 26, 2020, in light of orders from the state to limit in-person interactions during the
 19 current pandemic. In support of this Stipulation and Request, the parties state as follows:

- 20 1. Currently, the discovery deadline is set for May 18, 2020.
- 21 2. The parties intend to take at least four depositions before discovery closes, which
- 22 would require in-person interactions that should be avoided at this time due to the CoVID-19
- 23 pandemic and the declaration of a national emergency and Nevada state of emergency. Even video
- 24 conferencing depositions would require at least a videographer in the same room as both the deposing

1 attorney and the witness being deposed. Further, at least some of the witnesses have been subject to
2 state closures and are expected to stay home at this time and one of the depositions is of John Lee,
3 the Mayor of the City of North Las Vegas and another one of the depositions is of Ryann Juden, the
4 City Manager for the City of North Las Vegas, both of whom are handling issues related to the
5 pandemic on a daily basis.

6 3. The remaining depositions have not been conducted yet in this case because some
7 document-based discovery still needed to be completed prior to the taking of the depositions that was
8 further delayed by issues requesting the documents from third parties.

9 4. The parties have stayed discovery once pending the outcome of a hearing regarding
10 compelling the depositions of Mayor John Lee and City Manager Ryann Juden. Discovery has also
11 been extended previously, so rather than ask for additional extensions without knowing when the
12 pandemic will be suppressed, allowing for in-person depositions again, and in an effort to conserve
13 both the parties' and the court's limited time and resources due to the partial shutdown, the parties
14 seek to stay all proceedings and related deadlines for at least sixty (60) days.

15 5. In the event the pandemic has been sufficiently suppressed by May 19, 2020, the
16 parties agree to submit a Joint Status Report within seven (7) days requesting a lifting of the stay of
17 discovery and outlining updated deadlines.

18 6. In the event the pandemic has not been sufficiently suppressed by May 26, 2020, the
19 parties will further confer about requesting an extension of the stay.

20 7. This request to stay proceedings is not sought for any improper purpose or other
21 reason of delay. Rather, it is sought only to conserve the parties' and court's respective resources and
22 efficiently yet responsibly conduct discovery.

23 / / /

24 / / /

1 WHEREFORE, the parties respectfully request that the Court stay proceedings in this case
2 for the next sixty (60) days.

3 DATED this 26th day of March, 2020.

4 Respectfully submitted,

Respectfully submitted,

5 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

6 /s/ Melanie A. Hill

/s/ Kaitlin H. Paxton

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10 Attorney for Plaintiff


Attorneys for Defendant

Pamela Dittmar

City of North Las Vegas

11
12
13 **IT IS SO ORDERED.**

14 4/2/2020



15 **DATE**

UNITED STATES MAGISTRATE JUDGE