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

11 NAVIGATORS INSURANCE COMPANY,  
 12 Plaintiff,  
 13 vs.  
 14 SPARTA INSURANCE COMPANY,  
 15 Defendant.

CASE NO. 2:17-cv-02999-RFB-CWH

**STIPULATION AND ORDER TO MODIFY  
 SCHEDULING ORDER DEADLINES  
 (FIRST REQUEST)**

17 **STIPULATION TO MODIFY SCHEDULING ORDER DEADLINES**

18 This Stipulation to modify the scheduling order is entered into by and between Plaintiff  
 19 NAVIGATORS INSURANCE COMPANY (hereinafter "Plaintiff") and SPARTA INSURANCE  
 20 COMPANY (hereinafter "Defendant"), by and through their attorneys of record, pursuant to  
 21 LR 6-1(b) and LR 26(4) and based upon the following:

22 **(a) A statement of Discovery Completed to Date:**

23 Plaintiff and Defendant have exchanged initial disclosures of documents and the  
 24 names of individuals with knowledge of the facts pertaining to Plaintiff's claims against the  
 25 Defendant. The Defendant has propounded written discovery requests to Plaintiff, including  
 26 interrogatories and requests for production, and Plaintiff has served its responses to  
 27  
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1 Defendant's interrogatories. The Plaintiff has propounded interrogatories and requests for  
2 production to Defendant.

3 **A specific description of the discovery that remains to be completed**

- 4 • Defendant anticipates taking the deposition of Plaintiff's FRCP 30(b)(6)  
5 Person(s) with Knowledge.
- 6 • Plaintiff anticipates taking the depositions of Defendant's FRCP 30(b)(6)  
7 Person(s) with Knowledge.
- 8 • Defendant anticipates taking the deposition of Plaintiff's Expert(s).
- 9 • Plaintiff anticipates taking the deposition of Defendant's Expert(s).
- 10 • The Plaintiff anticipates issuing subpoenas to non-parties for business  
11 records.

12 **(b) The reason why discovery remaining was not completed within the time**  
13 **limits set by the discovery plan**

14 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested  
15 extension. The parties agree that, pending this Court's approval, extension of the discovery  
16 deadlines is appropriate, as the parties wish to further investigate this case, and potentially  
17 reach a resolutions prior to incurring fees and costs for extensive discovery. An extension is  
18 also necessary for the depositions of Defendant's and Plaintiff's FRCP 30(b)(6) Person(s)  
19 with Knowledge. Further, it has become apparent that between witness' travel plans over  
20 the summer and counsel's trial calendars, it will be impractical if not impossible for the parties  
21 to adequately complete discovery before the discovery deadline of July 11.

22 The parties are seeking a 90 day continuance of below referenced dates:

23 **(c) A proposed schedule for completing all remaining discovery:**

24 <b>Deadline</b>	<b>Current Deadline Date</b>	<b>Extension Sought</b>
25 Expert disclosure deadline	May 14, 2018	<b>August 13, 2018</b>
26 Rebuttal expert disclosure deadline	June 13, 2018	<b>September 11, 2018</b>
27 Discovery Deadline	July 11, 2018	<b>October 9, 2018</b>

1	Dispositive Motion Deadline	August 10, 2018	<b>November 8, 2018</b>
2	Pre-Trial Order Deadlines	September 10, 2018	<b>December 10, 2018</b>
3	Amend Pleadings and Add Parties	April 12, 2018	<b>closed</b>
4	Interim Status Report	May 14, 2016	<b>August 10, 2018</b>

5  
6 DATED: May 14, 2018

7 **MURCHISON & CUMMING, LLP**

**MORALES, FIERRO & REEVES**

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Attorneys for Plaintiff

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18 **IT IS SO ORDERED:**

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**UNITED STATES MAGISTRATE JUDGE**

**DATED:** May 16, 2018