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16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

<p>18 Keith H. Asbell,</p> <p>19 Plaintiff,</p> <p>20 v.</p> <p>21 Experian Information Solutions,</p> <p>22 Inc. and Trans Union LLC</p> <p>23 Defendants.</p> <p>24</p> <p>25</p> <p>26</p>	<p>Case No. 2:17-cv-03122-JCM-PAL</p> <p>Joint Stipulation and Order to</p> <p>Extend Discovery</p> <p>(First Request)</p>
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1 Plaintiffs Keith H. Asbell (“Plaintiff”) and Experian Information Solutions, Inc.
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. 13, to
4 extend:

5 (1) the last date to disclose experts from May 24, 2018, to **June 25, 2018**

6 (2) the last date to disclose rebuttal experts from June 25, 2018, to **July 25,**
7 **2018**

8 (3) the last date to complete discovery from July 23, 2018, to **August 23, 2018;**

9 (4) the last date to file dispositive motions from August 22, 2018, to
10 **September 24, 2018;** and

11 (5) the last date to file the proposed joint pretrial order from September 21,
12 2018, to **October 22, 2018.**

13 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The
14 Parties have diligently engaged in written discovery. Plaintiff has propounded written
15 discovery requests and is continuing to meet and confer with Defendant regarding
16 documents withheld because of the lack of a Protective Order (which has since been
17 entered). As set forth in Defendant’s discovery responses, it agreed to supplement
18 upon entry of the protective order and will do so. Experian has also served written
19 discovery requests to Plaintiff.

20 The Parties ran into scheduling conflicts with Experian’s Rule 30(b)(6) witness
21 and Plaintiff has now noticed Experian’s deposition for June 1, 2018. Experian’s
22 witness is not available on June 1st, and Experian will provide Plaintiff with
23 alternative dates. Experian has noticed Plaintiff’s deposition for July 16, 2018. To
24 the extent that date does not work for Plaintiff, Experian will endeavor to find a
25 mutually convenient date for the parties. Plaintiff will seek to disclose an expert after
26 Defendant’s deposition and there is therefore good cause to extend the expert
27 disclosure deadline until after Defendant discloses its documents and after
28 Defendant’s deposition. Plaintiff will also now seek third party discovery from Wells

1 Fargo Home Mortgage since Experian is denying it received credit reporting from
2 Wells Fargo Home Mortgage. The Parties are also actively discussing resolution of
3 this case. This request for extension of deadlines is made specifically in this fee-
4 shifting matter since the taking of depositions are a significant expense. The Parties
5 ran into limitations based on the availability of Experian for deposition and therefore
6 seek to extend the discovery deadlines by 30 days.

7 Pursuant to LR 26-4(a), as set forth above, Plaintiff has propounded written
8 discovery requests on Defendant, Defendant has propounded discovery on Plaintiff.
9 The Parties have noticed each others' depositions.

10 Pursuant to LR 26-4(b), the Parties request additional time to continue to meet
11 and confer about discovery documents, third party discovery relating to Wells
12 Fargo's credit reporting history, and to conduct depositions and disclose experts, as
13 necessary.

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

- 15 (1) the last date to disclose experts will be **June 25, 2018**
16 (2) the last date to disclose rebuttal experts will be **July 25, 2018**
17 (3) the last date to complete discovery will be **August 23, 2018**;
18 (4) the last date to file dispositive motions will be **September 24, 2018**; and
19 (5) the last date to file the proposed joint pretrial order will be **October 22,**
20 **2018.**

21 For these reasons, the Parties jointly request that this Court modify the
22 Scheduling Order to provide an additional 30 days to complete discovery, and the in
23 the ordinary course file dispositive motions, and the proposed joint pretrial order as
24 described in the proposed timeline above.

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1 This is the Parties' first request for an extension of these deadlines.

2 DATED this 23rd day of May 2018.

3 **KAZEROUNI LAW GROUP, APC**

NAYLOR & BRASTER

4
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Attorneys for Defendant
Experian Information Solutions, Inc.

11 **ORDER**

12 IT IS HEREBY ORDERED that the Order, ECF No 13, is modified to extend
13 the discovery deadlines as follows:

- 14 (1) the last date to disclose experts shall be **June 25, 2018**
- 15 (2) the last date to disclose rebuttal experts shall be **July 25, 2018**
- 16 (3) the last date to complete discovery shall be **August 23, 2018**;
- 17 (4) the last date to file dispositive motions shall be **September 24, 2018**; and
- 18 (5) the last date to file the proposed joint pretrial order shall be **October 22,**
19 **2018.**

20 IT IS SO ORDERED.

21 
22 UNITED STATES MAGISTRATE JUDGE

23 Dated: June 6, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on May 23, 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
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