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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUTH ESPINOZA,)	CASE NO: 2:18-CV-00112-GMN-GWF
)	
Plaintiff,)	FIRST STIPULATION AND ORDER
)	TO EXTEND DISCOVERY
vs.)	DEADLINES
)	
SMITH'S FOOD & DRUG CENTERS,)	
INC. a Ohio Corporation, SMITH'S FOOD)	
& DRUG CENTERS, a Nevada Business)	
Trust; and DOE PERSONS I through X,)	
inclusive; and ROE CORPORATIONS XI)	
through XX, inclusive,)	
)	
Defendants.)	
)	

Pursuant to LR IA 6-1 and LR 26-4, the parties, by and through their respective counsel, hereby stipulate and request that this Court extend the deadline for discovery in the above-captioned matter for forty-five (45) days, or up to and including September 6, 2018.

DISCOVERY COMPLETED:

- Plaintiff has served her Initial Disclosures and supplements thereto.
- Defendant has served its Initial Disclosures and supplements thereto.
- Defendants have served subpoenas duces tecums to all of Plaintiff's medical providers.
- Plaintiff's deposition has been taken.
- Plaintiffs have served and responded to written discovery.
- Defendants have served and responded to written discovery.

REMAINING DISCOVERY TO BE COMPLETED:

- Initial and rebuttal expert disclosures;
- Fact and expert witness depositions; and
- Any additional written discovery that may be necessary following this discovery.

REASONS WHY EXTENSION REQUESTED:

On May 7, 2018, Plaintiff was informed that her medical expert was no longer able to prepare a report due to his father being ill and the expert consequently needing to be out of the country for an extended period of time. Due to the extent of Plaintiff's claimed injuries, it is not feasible for Plaintiff to retain another expert — and for that expert to effectively write a report — by the current expert disclosure deadline, which is 17 days away. Plaintiff is diligently working to retain a new expert and to get the relevant records to a new expert to reduce any delay.

Based on foregoing, good cause exists to extend the discovery deadline to allow Plaintiffs to take these outstanding depositions.

PROPOSED SCHEDULE FOR REMAINING DEADLINES:

The following is a list of the current deadlines and the parties' proposed extended deadlines:

	Current	Proposed
Discovery Cut-Off	7/23/2018	9/6/2018
Expert Disclosure	5/24/2018	7/6/2018
Rebuttal Disclosures	6/25/2018	8/6/2018
Dispositive Motions	8/22/2018	10/5/2018
Pre-Trial Order	9/21/2018	11/6/2018

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute "good cause" justifying the extension.

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