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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ROBERT REED,

Case No.: 2:18-cv-00146-JAD-CWH

11 Plaintiff,

12 v.

**STIPULATION FOR EXTENSION
 OF DISCOVERY DEADLINES**

13 CONVERGENT OUTSOURCING, INC. and
 COMCAST ENTERPRISE SERVICES, LLC.,

[First Request]

14 Defendants.
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16 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
 17 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
 18 ninety (90) days, up to and including December 4, 2018. In addition, the parties request that the
 19 dispositive motions and pretrial order deadlines be extended for an additional ninety (90) days, as
 20 outlined herein. In support of this Stipulation and Request, the parties state as follows:

21 **A. Discovery Completed to Date.**

- 22 1. Plaintiff filed his Complaint on January 26, 2018.
 23 2. Defendant Comcast Enterprise Services, LLC filed its Answer on March 6, 2018.
 24 3. Defendant Convergent Outsourcing, Inc. filed its Answer on March 22, 2018.
 25 4. Defendant Comcast Enterprise Services, LLC served its initial disclosure on April
 26 13, 2018.
 27 5. Defendant Convergent Outsourcing, Inc. served its initial disclosure on April 20,
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2018.

6. Plaintiff Robert Reed served his initial disclosure on May 20, 2018.

B. Specific Description of Discovery that Remains to be Completed.

- 1. Completion of written discovery and document productions.
- 2. Depositions of Plaintiff, Defendant Convergent Outsourcing, Inc., and Defendant Comcast Enterprise Services, LLC.
- 3. Depositions of any remaining witnesses.

C. Reasons Why the Remaining Discovery was not Completed.

The parties aver, pursuant to LR6-1, good cause exists for requested extension. The parties have been, and continue to make diligent efforts to settle this matter. The parties agree the current deadlines restrict all parties from potentially settling this matter and conducting the remaining necessary discovery.

D. Proposed Discovery Deadlines.

Event	Current Deadline	Proposed New Deadline
Close of Discovery	September 4, 2018	December 3, 2018
Dispositive Motions	October 4, 2018	January 2, 2019
Pretrial Order	November 5, 2018	February 3, 2019

IT IS SO STIPULATED THIS 16th day of July, 2018.

Dated this 17th day of July, 2018.

Dated this 17th day of July, 2018.

THE LAW OFFICE OF VERNON NELSON

SPRINKEL & FINK

/s/ Melissa Ingleby
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1 Dated this 17th day of July, 2018.

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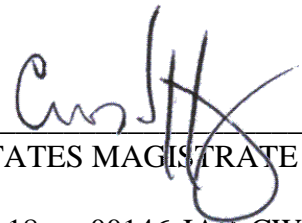
CLARK HILL PLLC

/s/ Jeremy Thompson
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Services, LLC*

ORDER

IT IS SO ORDERED.

Dated: August 3, 2018



UNITED STATES MAGISTRATE JUDGE

Case No.: 2:18-cv-00146-JAD-CWH