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SAO
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SANDRA DE BLANC,)
)
Plaintiff,)
) **CASE NO.: 2:18-cv-00151-APG-CWH**
vs.)
)
ALOHA AIRPORT EXPRESS, a Foreign Limited)
Liability Company; does 1 THROUGH 20; ROE)
BUSINESS ENTITIES 1 through 20, inclusive)
jointly and severally,)
)
Defendants.)
)

STIPULATION AND ORDER FOR EXTENSION OF TIME
TO COMPLETE DISCOVERY (FIRST REQUEST)

The parties stipulate to an extension of discovery deadlines, currently set pursuant to the Stipulated Discovery Plan and Scheduling Order [Doc. #10] filed on March 7, 2018.

I. DISCOVERY THAT HAS BEEN COMPLETED IN THIS MATTER INCLUDES THE FOLLOWING:

The following discovery has been completed by the parties:

- 1. Plaintiff received written discovery;
- 2. Plaintiff's Initial Disclosure;



1 3. Defendant's Initial 16.1 Disclosure.

2 **II. DISCOVERY THAT REMAINS TO BE COMPLETED:**

3 The discovery that remains to be completed includes, but is not limited to:

- 4 1. Initial expert disclosures;
- 5 2. Depositions of expert witnesses
- 6 3. Deposition of Person(s) Most Knowledgeable for Aloha
- 7 Airport Express;
- 8 4. Deposition of Plaintiff;
- 9 5. Depositions of Plaintiff's treating providers;
- 10 6. Additional written discovery requests.
- 11 7. Requesting and obtaining updated medical records.
- 12 8. Any other potential depositions or written discovery which
- 13 may become necessary as discovery continues.

14 **III. REASONS WHY THE DISCOVERY REMAINING WILL NOT BE COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER**

15 The parties to this action need additional time to complete discovery. The Plaintiff lives
16 out of state and takes care of her elderly, sick husband. She has to make arrangements for
17 somebody to stay with him while she travels back to Las Vegas for her deposition. Defense
18 counsel has been kind enough to accommodate for this and has agreed to extend any outstanding
19 deadlines.
20

21 **IV. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

22 The parties hereby stipulate to continue the discovery deadlines **sixty (60)** days as
23 follows:
24

	Old Deadline:	New Deadline:
25 Last day to Amend Pleadings:	04/26/2018	06/25/2018
26 Initial Expert Disclosures:	05/25/2018	07/24/2018

1	Interim Status Report	05/25/2018	07/24/2018
2	Rebuttal Expert Disclosures:	06/25/2018	08/24/2018
3	Close of Discovery:	07/25/2018	09/24/2018
4			
5	Dispositive Motion Deadline:	08/24/2018	10/23/2018
6	Pre-Trial Order, if no Dispositive Motions	09/24/2018	11/23/2018
7			
8			

9 Dated this 27th day of April, 2018

Dated this 27th day of April, 2018

11 By: /s/ Michaela E. Wood

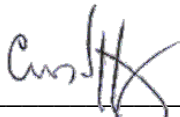
By: /s/ Christopher D. Phipps

12 RICHARD HARRIS LAW FIRM
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15 801 S. Fourth Street
16 Las Vegas, NV 89101
17 Attorneys for Plaintiff

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300 S. Fourth Street, 11th Floor
Las Vegas, NV 89101
Attorneys for Defendant

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20 IT IS SO ORDERED

21 DATED: May 1, 2018

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23 _____
24 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of RICHARD HARRIS LAW FIRM, and that on this 27th day of April, 2018, I served a copy of the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO COMPLETE DISCOVERY** by the CM/ECF electronic filing system of the United States District Court for the District of Nevada, upon each party in this case who is registered as an electronic filing user with the Clerk.

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/s/ Nicole Gilenson

An Employee of Richard Harris Law Firm