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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GEORGE HILAN, an individual,

Plaintiff,

CASE NO.: 2:18-cv-00206-RFB-PAL

vs.

**STIPULATION AND ORDER TO
EXTEND TIME TO COMPLETE
DISCOVERY PURSUANT TO LR 26-4**

MISSION RIDGE HOMEOWNERS
ASSOCIATION, a domestic non-profit
corporation; and DOES 1 through 100; and
ROE CORPORATIONS 101 through 200,
inclusive;

Defendants.

(First Request)

HARPER | SELIM
CIVIL AND COMMERCIAL LITIGATION

Pursuant to Local Rule 26-4, Rule 6 and Rule 16 of the Federal Rules of Civil Procedure, the parties, by and through their respective counsel of record, and for good cause, hereby stipulate to extend the remaining discovery deadlines in the above-entitled matter by one-hundred twenty (120) days. This is the parties' first request. The parties state the following:

1. STATEMENT SPECIFYING DISCOVERY COMPLETED:

Defendant's Initial Disclosures Pursuant to Rule 26(a)(1)	3/15/2018	Mission Ridge
Plaintiff's Initial Disclosures Pursuant to Rule 26(a)(1)	5/10/2018	Hilan
First Set of Requests for Admission to Plaintiff	4/20/2018	Mission Ridge
First Set of Interrogatories to Plaintiff	4/20/2018	Mission Ridge
First Set of Requests for Production of Documents to Plaintiff	4/20/2018	Mission Ridge

Plaintiff's responses to Defendant's First set of Requests for Admission	5/14/2018	Hilan
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2. **SPECIFIC DESCRIPTION OF DISCOVERY THAT NEEDS TO BE COMPLETED:**

Independent gathering of Plaintiff's medical records and bills from Plaintiff's medical providers and health insurer (once the medical authorizations are received back from Plaintiff); Plaintiff's responses to Defendant's Interrogatories and Request for Production; The deposition of Plaintiff; The deposition of Plaintiff's wife; The deposition of any 30(b)(6) witness(es); The deposition of the parties' experts; The deposition of percipient witnesses; The deposition of Plaintiff's treating physicians; Retention and disclosure of expert witnesses.

3. **THE REASON WHY THE DEADLINE WILL LIKELY NOT BE SATISFIED:**

Currently, no discovery deadline has passed. However, the initial expert disclosure deadline of June 29, 2018, is quickly approaching. At this time, the parties are working on retaining their initial experts, but believe that they will need additional time for their experts to complete their reports and to disclose such experts.

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4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

<u>Scheduled Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Deadline	August 28, 2018	December 28, 2018
Amending the Pleadings	May 30, 2018	May 30, 2018
Initial Experts	June 29, 2018	October 29, 2018
Rebuttal Experts	July 29, 2018	November 28, 2018
Interim Status Report	June 29, 2018	October 29, 2018
Dispositive Motions	September 26, 2018	January 28, 2019

Dated: May 18, 2018.

BERNSTEIN & POISSON

By: /s/ Brian Boyer
BRIAN BOYER, ESQ.
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Dated: May 18, 2018.

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ORDER

IT IS SO ORDERED.

DATED this 18th day of June, 2018.


UNITED STATES MAGISTRATE JUDGE