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7 *Attorneys for Defendant*
 8 *Walmart Inc.*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 MANUEL SANCHEZ,

12 Plaintiff,

13 v.

14 WAL-MART STORES INC.; DOES 1-20 and
 ROE BUSINESS ENTITIES 1-20, inclusive,

15 Defendants.

Case No.: 2:18-cv-00282-APG-CWH

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DISCOVERY
 DEADLINES**

[FIRST REQUEST]

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 18 Plaintiff MANUEL SANCHEZ (“Plaintiff”) and Defendant WAL-MART STORES, INC.
 19 (“Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the
 20 discovery deadlines in the present case for a period of 60 days Pursuant to Local Rule IA 6-1 and Local
 21 Rule 26-4.
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23 Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the first such discovery
 24 extension requested in this matter.

25 **DISCOVERY COMPLETED TO DATE**

- 26
- 27 • The parties have conducted an FRCP 26(f) conference and have served their respective
 FRCP 26(a) disclosures;
 - 28 • Walmart has served written discovery to Plaintiff;

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2 **DISCOVERY TO BE COMPLETED AND**
3 **REASONS FOR EXTENSION OF DISCOVERY**

4 Discovery to be completed includes:

- 5
- 6 • Plaintiff will serve responses to Walmart’s written discovery requests;
 - 7 • Plaintiff will propound written discovery to Walmart, and Walmart will serve responses;
 - 8 • Disclosure of expert witnesses;
 - 9 • Walmart will depose Plaintiff;
 - Depositions of fact witnesses;
 - Depositions of expert witnesses and treating medical providers;
 - Rule 35 examination of Plaintiff.

10 The parties aver, pursuant to Local Rule 26-4, that good cause exists for the requested extension.

11 Despite Plaintiff’s counsel’s diligent efforts, Plaintiff’s counsel has been unable to provide medical
12 authorizations to Defendant for the release of Plaintiff’s medical records. Further, Plaintiff’s counsel has
13 been unable to provide responses to Walmart’s written discovery requests, including information
14 regarding Plaintiff’s medical history, due to difficulties in maintaining communication with Plaintiff.
15 Plaintiff’s counsel is in the process of substituting in other legal representation for Plaintiff. As a result of
16 the foregoing, an extension of 60 days is necessary to give Walmart an opportunity to conduct necessary
17 discovery into Plaintiff’s medical history in time to make decisions regarding expert witness retention and
18 to retain expert witnesses prior to the expert disclosure deadline.

19
20 The parties have acted in good faith to request this extension and have no intent, nor reason, to
21 delay the resolution of this matter.

22
23 **[PROPOSED] NEW DISCOVERY DEADLINES**

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25 Discovery Cut-Off Date

26 Currently: August 13, 2018

27 Proposed: October 12, 2018

28 Joint Interim Status Report

1 Currently: June 14, 2018

2 Proposed: August 13, 2018

3 Expert Disclosure Deadline

4 Currently: June 14, 2018

5 Proposed: August 13, 2018

6 Rebuttal Expert Disclosure Deadline

7 Currently: July 16, 2018

8 Proposed: September 12, 2018

9 Dispositive Motion Deadline

10 Currently: September 12, 2018

11 Proposed: November 12, 2018

12 Joint Proposed Pre-Trial Order

13 Currently: October 12, 2018, or 30 days after resolution of dispositive motions per

14 Local Rule 26-1(e)(5).

15 Proposed: December 12, 2018, or 30 days after resolution of dispositive

16 motions per Local Rule 26-1(e)(5)

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1 If this extension is granted, all depositions mentioned above, a Rule 35 examination of Plaintiff,
2 and expert disclosures should be concluded within the stipulated extended deadline. The parties aver that
3 this request for extension of discovery deadlines is made by the parties in good faith and not for the
4 purpose of delay.
5

6
7 DATED this 24th day of May, 2018

DATED this 24th day of May, 2018.

8
9 /s/ Ian Estrada

/s/ Ryan Kerbow

10 Ian C. Estrada, ESQ.
11 Nevada Bar No. 12575
12 RICHARD HARRIS LAW FIRM
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13 *Attorneys for Plaintiff*
14 *Manuel Sanchez*

Attorneys for Defendant
Walmart Inc.

15
16 **IT IS SO ORDERED:**

17
18 
UNITED STATES MAGISTRATE JUDGE

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20 DATED: May 25, 2018