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UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA

MANUEL SANCHEZ,

Plaintiff,

vs.

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

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

Defendants.

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES

[SECOND REQUEST]

Plaintiff MANUEL SANCHEZ (“Plaintiff”) and Defendant WAL-MART STORES, INC. (“Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the discovery deadlines in the present case for a period of 60 days Pursuant to Local Rule IA 6-1 and Local Rule 26-4.

Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the second such discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- Walmart has served written discovery to Plaintiff;
- Plaintiff has Answered Discovery Propounded by Defendant Walmart



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

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7 DATED this _25___ day of July, 2018

DATED this _25___ day of July, 2018.

8 /s/ Ramzy P. Ladah

/s/ Ryan Kerbow

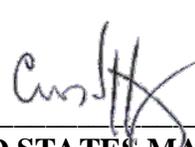
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13 *Attorneys for Plaintiff*
14 *Manuel Sanchez*

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16 Las Vegas, Nevada 89101

17 *Attorneys for Defendant*
18 *Wal-Mart Stores, Inc.*

19 **IT IS SO ORDERED:**

20 
21 _____
22 **UNITED STATES MAGISTRATE JUDGE**

23 **DATED:** July 26, 2018
24 _____
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LADAH LAW
FIRM

