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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 JUSTINE A. HARRISON, an individual;

14 Plaintiff,

15 v.

16 EXPERIAN INFORMATION SOLUTIONS,
17 INC., a foreign corporation;

18 Defendant.

Case No.: 2:18-cv-00297-JAD-GWF

19 **PROPOSED DISCOVERY PLAN AND
20 SCHEDULING ORDER**

21 **SUBMITTED IN COMPLIANCE WITH**
22 **LR 26-1(b)**

23 Under FRCP 26(f) and LR 26-1, counsel held a telephonic conference on **April 5, 2018**.

24 Based on the conference, the parties propose to the Court the following discovery plan:

- 25 a. FRCP 26(a)(1) Disclosures: **April 19, 2018**
- 26 b. Close of Discovery: **September 24, 2018**
- 27 c. FRCP 26(a)(2) Disclosures (Experts):
 - 28 i. Expert Disclosure: **July 26, 2018**
 - ii. Rebuttal Expert Disclosure: **August 27, 2018**
- d. Amend Pleadings and Add Parties: **June 26, 2018**
- e. Interim Status Report: **July 26, 2018**
- f. Dispositive Motions: **October 24, 2018**
- g. Pretrial Order: **November 26, 2018**

The disclosures required by FRCP 26(a)(3) shall be made in the joint pretrial order.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on dispositive motions or further court order.

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- 1 h. Subjects of Discovery: Discovery will be needed on the following subjects: All
2 claims set forth in the complaint as well as the defenses relevant to the action. No
3 discovery phases are needed or requested by the parties at this time.
- 4 i. Disclosures under Rule 26(a): Aside from electronic submission, the parties have no
5 changes to the timing, form, or requirement for disclosures under Rule 26(a).
- 6 j. Protective Order(s): Defendant anticipates production of confidential, trade secret,
7 and/or commercially sensitive information during the pendency of this action. As
8 such, defendants may request a protective order to be entered by the court to govern
9 the use and disclosure of information that is deemed confidential, trade secret,
10 and/or commercially sensitive;
- 11 k. Settlement: The parties have engaged in settlement discussions, and will continue to
12 discuss possible resolution of this matter.
- 13 l. Later Appearing Parties: A copy of this discovery plan and scheduling order shall
14 be served by Plaintiff on any person served after it is entered, or, if an additional
15 defendant should appear, within five (5) days of their first appearance. This
16 discovery plan and scheduling order shall apply to such later-appearing parties,
17 unless the court, on motion and for good cause shown orders otherwise.
- 18 m. Extension or Modification of the Discovery Plan and Scheduling Order: LR 26
19 governs modifications or extensions to this discovery plan and scheduling order.
- 20 n. Alternative Dispute Resolution: The parties certify that they met and conferred
21 about the possibility of using alternative dispute-resolution processes including
22 mediation, arbitration, and if applicable, early neutral evaluation;
- 23 o. Alternative Forms of Case Disposition: The parties certify that they considered
24 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P.
25 73 and the use of the Short Trial Program (General Order 2013-01).
- 26 p. Electronic Evidence: The parties do not anticipate discovery issues at this time and
27 do not foresee any issues arising from the disclosure of electronically stored
28 information. The parties agree to serve discovery requests, discovery responses, and

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disclosures via electronic mail. The parties further intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties reserve the right to amend this plan either through stipulation or motion.

Dated: April 6, 2018

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Dated: April 6, 2018

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 4/9/2018