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7	UNITED STATES DISTRICT COURT
8	DISTRICT OF NEVADA
9	JOHN FRANCIS, and individual,) Case No.: 2:18-cv-00344
10)
11	Plaintiff,) STIPULATION AND ORDER TO EXTERNO DISCOVERY
12	vs.) <u>EXTEND DISCOVERY</u>) <u>DEADLINES</u>
13	MID-CENTURY INSURANCE COMPANY:) (FIRST REQUEST) ROE CORPORATIONS I through X,)
14	inclusive,)
15	Defendants.)
16	Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective counsel
17	of record, hereby stipulate to and request that the Court extend the initial expert disclosure, interim
18	status report, rebuttal expert disclosure, discovery cut-off, dispositive motion and Pretrial Order
19	deadlines by sixty (60) days. The parties request this extension for the following reasons:
20	The Petition for Removal was filed on February 23, 2018 (ECF No. 1). On April 13, 2018,
21	a discovery plan was approved by the Court (ECF No. 9).
22	The current discovery plan contemplates the exchange of expert witness reports on June
23	22, 2018, the exchange of rebuttal witness reports on July 23, 2018, a discovery cut-off of August
24	22, 2018, and a dispositive motions deadline of September 21, 2018.
25	1. DISCOVERY COMPLETED:
26	Both parties have made their initial disclosures pursuant to FRCP 26. Defendant is in the
27	process of setting Plaintiff's deposition.
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DISCOVERY THAT REMAINS TO BE COMPLETED:

Defendant is retaining a physician to conduct a medical records review of Plaintiff, and it is anticipated that upon completion of Plaintiff's deposition, depositions will be taken of Plaintiff's treating physicians, as well as any designated expert(s) and rebuttal expert(s).

Plaintiffs will set depositions of claims employees, and Plaintiffs intend to take depositions of Defendant's expert(s).

3. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED AND WHY INITIAL EXPERT AND REBUTTAL EXPERT DISCLOSURES AND RELATED DEADLINES SHOULD BE EXTENDED.

The parties are still in the discovery process. Plaintiff is still receiving medical treatment,
and Defendant is still gathering records. Once all records are gathered, Defendant's medical
expert will need additional time to review them. An extension of the initial expert disclosure
deadline to August 23, 2018 is requested to allow Defendant to have Plaintiff's medical records
reviewed and the physician to provide his reports.

In addition, additional time will allow the parties to explore the possibility of settling this matter, without incurring additional expert expenses, if the same can be avoided, or subjecting the parties to any prejudice if settlement cannot be obtained. Counsel are in agreement that modification of all pending dates in the discovery plan is the most reasonable option. Accordingly, the parties have agreed to extend the deadlines to exchange expert reports, both initial and rebuttal, by sixty (60) days and to extend all of the related discovery deadlines in this case, as set forth below:

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4. **PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:**

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The parties have agreed to the following modified deadlines:

- A. Initial expert disclosure date: August 23, 2018 (formerly June 22, 2018).
- **B.** Interim status report date: August 23, 2018 (formerly June 22, 2018).
- C. Rebuttal expert disclosure date: September 21, 2018 (formerly July 23, 2018).

D. Discovery cut-off date: October 22, 2018 (formerly August 22, 2018).

1	E. Date for filing dispositive motions: November 21, 2018 (formerly
2	September 21, 2018).
3	F. Date for filing Pretrial Order: December 21, 2018 (formerly October
4	29, 2018).
5	(with date to change if dispositive motions filed).
6	THEREFORE, the parties stipulate and request that the Court enter an Order approving
7	the proposed discovery schedule set forth above.
8	IT IS SO STIPULATED.
9	Dated:5/31/2018 Dated:5/31/2018
10	
11	/s/ David Feldman/s/ Daniel DastrupDavid J. Feldman, Esq.Roger M. Cram, Esq.
12	Nevada Bar No. 5947Nevada Bar No.: 006612THE FELDMAN FIRMDaniel Dastrup, Esq.
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16	Insurance Company <u>rcram@cvbnlaw.com</u> Attorneys for Plaintiff John Francis
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19	IT IS SO ORDERED.
20	Cam Ferenbach
21	United States Magistrate Judge
22	DATED: June 1, 2018
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