

PETERSON BAKER, PLLC

701 S. 7th Street
Las Vegas, NV 89101
702.786.1001

1 TAMARA BEATTY PETERSON, ESQ., Bar No. 5218
tpeterson@petersonbaker.com
2 NIKKI L. BAKER, ESQ., Bar No. 6562
nbaker@petersonbaker.com
3 PETERSON BAKER, PLLC
701 S. 7th Street
4 Las Vegas, NV 89101
Telephone: 702.786.1001
5 Facsimile: 702.786.1002

6 L. LIN WOOD, ESQ. (*pro hac vice*)
lwood@linwoodlaw.com
7 NICOLE JENNINGS WADE, ESQ. (*pro hac vice*)
nwade@linwoodlaw.com
8 JONATHAN D. GRUNBERG, ESQ. (*pro hac vice*)
jgrunberg@linwoodlaw.com
9 G. TAYLOR WILSON, ESQ. (*pro hac vice*)
twilson@linwoodlaw.com
10 L. LIN WOOD, P.C.
1180 West Peachtree Street, Suite 2040
11 Atlanta, Georgia 30309
Telephone: 404.891.1402
12 Facsimile: 404.506.9111

13 *Attorneys for Plaintiff Steve Wynn*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 STEVE WYNN, an individual,

17 Plaintiff,

18 v.

19 LISA BLOOM, an individual; and THE
20 BLOOM FIRM, a California Professional
Corporation,

21 Defendants.

Case No.: 2:18-cv-00609-JCM-GWF

**STIPULATION AND [PROPOSED]
ORDER RE: COMPLETION OF
AUTHORIZED DISCOVERY AND
BRIEFING SCHEDULE ON RENEWED
ANTI-SLAPP MOTION**

22
23 Plaintiff Steve Wynn ("**Mr. Wynn**"), by and through his attorneys of record, Tamara Beatty
24 Peterson, Esq. and Nikki L. Baker, Esq., of Peterson Baker, PLLC, and L. Lin Wood, Esq., Nicole
25 Jennings Wade, Esq., Jonathan D. Grunberg, Esq., and G. Taylor Wilson, Esq., of L. Lin Wood,
26 P.C., and Defendants Lisa Bloom and The Bloom Firm (collectively, the "**Bloom Defendants**"),
27 by and through their attorneys of record, Marc J. Randazza, Esq., Ronald D. Green, Esq., and Alex
28 J. Shepard, Esq., of the Randazza Legal Group, PLLC, hereby agree and stipulate, subject to the

1 Court's approval, as follows:

2 1. On March 26, 2019, Mr. Wynn filed his "Motion for Discovery to Respond to
3 Defendants' Special Motion to Dismiss Pursuant to NRS 41.660" [ECF No. 34] ("**Discovery**
4 **Motion**"), requesting that the Court permit Mr. Wynn to engage in certain discovery prior to
5 responding to any anti-SLAPP motion filed by the Bloom Defendants, and requesting a scheduling
6 order for such discovery and briefing.

7 2. On March 28, 2019, the Bloom Defendants filed "Defendants Lisa Bloom and The
8 Bloom Firm's Renewed Special Motion to Dismiss Pursuant to NRS 41.660" [ECF No. 36]
9 ("**Renewed anti-SLAPP Motion**").

10 3. On April 8, 2019, the Court entered an order granting Mr. Wynn's "Motion for
11 Extension of Time to Respond to Defendants' Renewed Anti-SLAPP Motion [ECF No. 36]" [ECF
12 No. 38] (the "**Extension Order**"). *See* ECF No. 39. In the Extension Order, the Court ordered,
13 among other things, that "if the court grants in whole or in part plaintiff's discovery motion, plaintiff
14 shall file a motion requesting a proposed deadline to file a response" to the Renewed anti-SLAPP
15 Motion. *Id.*

16 4. On May 5, 2019, the Court entered an order granting, in part, and denying, in part,
17 Mr. Wynn's Discovery Motion (the "**Discovery Order**"). *See* ECF No. 45.

18 5. In the Discovery Order, the Court ordered the parties to "submit a proposed schedule
19 for completion of the authorized discovery, together with a briefing schedule on Defendants'
20 Renewed Motion to Dismiss Pursuant to NRS 41.660 (ECF No. 36)." *See* ECF No. 45 at 11:2-4.

21 6. The Parties propose the following schedule for completion of discovery authorized
22 by the Discovery Order:

23 a.) Mr. Wynn is not required to renew and re-serve his requests for production;
24 rather, the requests, and the documents required to be produced by the Bloom Defendants, are
25 limited by the Discovery Order;

26 b.) No later than two (2) weeks after entry of an Order approving this
27 Stipulation, the Bloom Defendants shall respond to Mr. Wynn's "First Set of Requests for
28

1 Production of Documents to Defendant The Bloom Firm [Nos. 1-28]" served on January 30, 2019,
2 subject to the limitations in paragraph 2 of the Discovery Order (ECF No. 45 at p. 10). To that end,
3 the Bloom Defendants need not produce documents in response to Request Nos. 22, 23, and 24;

4 c.) No later than two (2) weeks after entry of an Order approving this
5 Stipulation, the Bloom Defendants shall disclose all known contact information for Angelina
6 Mullins, Colt Prattes, Samuel Cahn-Temes, and Lauren Molina to enable Mr. Wynn to subpoena
7 these individuals for their depositions. However, any disclosure may be limited by the rules of
8 professional conduct. In the event that it is, such limitation shall be explained, in writing;

9 d.) The depositions of Angelina Mullins, Colt Prattes, Samuel Cahn-Temes, and
10 Lauren Molina shall be taken first, followed by the deposition of Jordan Olsin, and then the
11 deposition of Charles Glasser, Esq.;

12 e.) Provided the depositions of Angelina Mullins, Colt Prattes, Samuel Cahn-
13 Temes, Lauren Molina, and Jordan Olsin have been completed *and* the Bloom Defendants have
14 complied with Paragraph 6(b), *supra*, Mr. Wynn shall depose Mr. Glasser in New York City on
15 July 2, 2019, and shall be responsible for paying Mr. Glasser's hourly fee of \$550.00 for his actual
16 deposition time;

17 f.) Each of the above depositions shall be limited to the durations set forth in
18 the Discovery Order and to questions relevant to the issue of whether the Bloom Defendants acted
19 with actual malice in publishing their press release of March 22, 2018;

20 g.) Mr. Wynn is not precluded from requesting leave of court to conduct a
21 second deposition of Angelina Mullins, Colt Prattes, Samuel Cahn-Temes, Lauren Molina, Jordan
22 Olsin, and/or Charles Glasser, Esq. on issues other than actual malice, or from exceeding the seven
23 (7) hour limitation set forth in Fed. R. Civ. P. 30(d)(1) for Ms. Mullins, Mr. Oslin and/or Mr.
24 Glasser, should the Court deny the Bloom Defendants' Renewed anti-SLAPP Motion; and

25 h.) Mr. Wynn has until and including August 9, 2019, to complete the discovery
26 authorized by the Discovery Order. However, Mr. Wynn may seek leave of Court to extend this
27 discovery period for good cause shown.
28

1 7. The Parties propose the following briefing schedule for the Renewed anti-SLAPP
2 Motion:

3 a.) Mr. Wynn shall file and serve his response in opposition to the Renewed
4 anti-SLAPP Motion on or before twenty-one (21) days following the completion of the above-
5 described discovery, and in any event no later than August 30, 2019; and

6 b.) The Bloom Defendants shall file and serve their reply in support of the
7 Renewed anti-SLAPP Motion fourteen (14) days after service of Mr. Wynn's response.

8 8. The Parties submit this Stipulation in compliance with the Extension Order and the
9 Discovery Order, and respectfully submit that good cause exists for the Court to approve this
10 Stipulation.

11 Respectfully submitted this 14th day of May, 2019.

12 PETERSON BAKER, PLLC

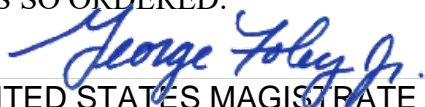
12 RANDAZZA LEGAL GROUP, PLLC

14 By: /s/ Nikki L. Baker
14 TAMARA BEATTY PETERSON ESQ.
15 Nevada Bar No. 5218
15 NIKKI L. BAKER, ESQ., Bar No. 6562
16 PETERSON BAKER, PLLC
16 701 S. 7th Street
17 Las Vegas, NV 89101
17 Telephone: 702.786.1001
18 Facsimile: 702.786.1002

14 By: /s/ Alex J. Shepard
14 MARC J. RANDAZZA, ESQ.
15 Nevada Bar No. 12265
15 RONALD D. GREEN, ESQ.
16 Nevada Bar No. 7360
16 ALEX J. SHEPARD, ESQ.
17 Nevada Bar No. 13582
17 2764 Lake Sahara Drive, Suite 109
18 Las Vegas, Nevada 89117
18 Telephone: 702.420.2001
19 Facsimile: 305.437.7662
19 ecf@randazza.com
20 Attorneys for Defendants Lisa Bloom
20 and The Bloom Firm

19 L. LIN WOOD, ESQ.
19 *(Admitted Pro Hac Vice)*
20 NICOLE JENNINGS WADE, ESQ.
20 *(Admitted Pro Hac Vice)*
21 JONATHAN D. GRUNBERG, ESQ.
21 *(Admitted Pro Hac Vice)*
22 G. TAYLOR WILSON, ESQ.
22 *(Admitted Pro Hac Vice)*
23 L. LIN WOOD, P.C
23 1180 West Peachtree Street, Suite 2040
24 Atlanta, Georgia 30309
24 Attorneys for Plaintiff Steve Wynn

25 IT IS SO ORDERED.

26 

27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 5/14/2019