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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 Darvis Lewis, individually,
10 Plaintiff.

11 vs.

12 WALGREEN CO., d/b/a Walgreen's;
and DOES 1 through 100; and ROE
13 CORPORATIONS 101 through 200,
14 Defendant.

Case No.: 2:18-cv-00827-JAD-PAL

STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES AND TRIAL
(First Request)

15 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES AND TRIAL**
16 **(First Request)**

17 Pursuant to Local Rules 6-1 and 26-4, the parties, by and
18 through their respective counsel of record, hereby stipulate to
19 and request that the Court extend the deadlines by ninety days.

20 **DISCOVERY COMPLETED**

21 The following discovery has been completed by the parties:

- 22 1. Proposed Joint Discovery Plan and Scheduling Order
23 dated July 13, 2018.

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- 1 2. Defendant's Initial FRCP 26(f) Disclosure dated June
- 2 26, 2018;
- 3 3. Plaintiff's First Set of Interrogatories to Defendant
- 4 dated July 23, 2018.
- 5 4. Plaintiff's First Request for Production of Documents
- 6 to Plaintiff dated July 24, 2018;
- 7 5. Defendant's First Request for Production of Documents
- 8 to Plaintiff dated August 15, 2018;
- 9 6. Defendant's First Set of Interrogatories to Plaintiff
- 10 dated August 15, 2018.

DISCOVERY TO BE COMPLETED

- 12 1. Obtain Plaintiff's medical records;
- 13 2. The parties may retain expert witnesses;
- 14 3. Depositions of parties;
- 15 4. Depositions of expert witness(es) and Plaintiff's
- 16 treating physician(s).

REASONS THAT DISCOVERY HAS NOT YET BEEN COMPLETED

18 The parties have been working diligently to complete
19 discovery. Defendant is still in the process of obtaining
20 Plaintiff's medical records, including numerous records
21 predating the subject accident from an accident which Defendant
22 just recently became aware of and that are highly relevant to
23 this case. As such, Defendant has found it difficult to

1 properly hire an expert to opine as to the causation of
 2 Plaintiff's injuries. Parties have been cooperative in
 3 exchanging disclosures and authorizations, but obtaining records
 4 has been slow going.

5 At this time, the parties seek a ninety (90) day extension
 6 of pending discovery deadlines as additional time is needed to
 7 complete the remaining discovery noted.

8 **PROPOSED SCHEDULE OF DISCOVERY**

9 The parties hereby stipulate to continue the Discovery as
 10 follows:

	<u>Current Deadline</u>	<u>Proposed</u>
12 Last Day to Amend Pleadings:	08/15/18	11/13/18
13 Initial Expert Disclosures:	09/14/18	12/13/18
14 Interim Status Report:	09/14/18	12/13/18
15 Rebuttal Expert Disclosures:	10/14/18	01/13/19
16 Discovery Deadline:	11/13/18	02/11/19
17 Dispositive Motion Deadline:	12/12/18	03/12/19
18 Joint Pre-Trial Order:	01/11/19	04/11/19
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1 SAID DISCOVERY REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR TRIAL OF THIS MATTER

3 Bernstein & Poisson	3 RANALLI ZANIEL FOWLER & MORAN, LLC
4 Dated: August 17, 2018	4 Dated: August 17, 2018
5 <u>/s/ Jamie H. Corcoran, Esq.</u>	5 <u>/s/ Michael G. Trippiedi, Esq.</u>
6 Scott L. Poisson, Esq.	6 JAMES F. HOLTZ, ESQ.
7 Nevada Bar No.: 10188	7 Nevada Bar No. 8119
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12 <i>Attorneys for Plaintiff</i>	12 <i>Attorneys for Defendant</i>
13 DARVIS LEWIS	13 WALGREEN CO.

14 **ORDER**

15 IT IS SO ORDERED:

16 Dated: August 21, 2018

17 
18 UNITED STATES MAGISTRATE JUDGE

RANALLI ZANIEL FOWLER & MORAN, LLC
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