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 STURGEON ELECTRIC COMPANY, INC.

8
 9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 BRENDA CHERRY EDWARDS,
 12 Individually,

13 Plaintiff,

14 vs.

15 STEPHEN ANTHONY LATTIMER,
 Individually; STURGEON ELECTRIC
 16 COMPANY, INC., a foreign corporation;
 DOES I through X, inclusive; and ROE
 17 CORPORATIONS I through XX, inclusive,

18 Defendants.

CASE NO.: 2:18-cv-01072-JCM-NJK

~~PROPOSED~~ STIPULATION TO
 ENLARGE DISCOVERY PLAN AND
 SCHEDULING ORDER
 (FIRST REQUEST)

19
 20 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective
 21 counsel of record, hereby stipulate and request that this Court extend discovery in the
 22 above-captioned case over ninety (90) days, including April 15, 2019, to complete a
 23 FRCP medical exam. In addition, the parties request that the dispositive motions and
 24 pretrial order deadlines be extended as outlined herein. In support of this Stipulation and
 25 Request, the parties state as follows:

26 STATEMENT SPECIFYING DISCOVERY COMPLETED

27 Plaintiff served Defendants with medical records.

28 Defendants served their initial disclosures.

1 Defendants served written discovery.

2 Defendants requested a FRCP Rule 35 medical exam.

3 **DISCOVERY REMAINING**

4 1. The parties will complete all written discovery.

5 2. The Plaintiff will take the deposition of the Defendants.

6 3. The Defendants will retain a medical expert to conduct a FRCP Rule 35
7 medical examination for any part in controversy.

8 3. The Defendants will take the deposition of the Plaintiff to coincide with her
9 FRCP Rule 35 medical examination.

10 3. The parties will take the depositions of any and all other witnesses garnered
11 through discovery.

12 This Request for an extension of time is not sought for any improper purpose or
13 other purpose of delay. Rather, it is sought by the parties solely for the purpose of
14 allowing sufficient time to conduct discovery.

15 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

16 Recently counsel have met and conferred regarding the Defendants' request for an
17 extension of time to complete the FRCP 35 medical exam of Plaintiff. Defense counsel
18 cannot schedule and complete the exam until after the current deadline to disclose initial
19 experts (October 15, 2018), as the doctor's office needed more dates and times to
20 conduct the examination and complete the report sometime after December, 2018.
21 Bradley S. Mainor, Esq., Plaintiff's counsel, has agreed to extend the deadlines to
22 complete the exam due to the doctor's limited availability, and then complete the
23 Plaintiff's deposition to coincide with the examination. This will save time, costs and
24 judicial resources, and allow Plaintiff to provide her records before the exam.

25 The parties have been compiling documents and investigating the instant action.
26 The parties are actively engaged in written discovery and will proceed with any remaining
27 case depositions. The parties jointly request the Court to approve the foregoing First
28 Extension to the Stipulated Discovery Plan and Scheduling Order as follows:

1 Extension or Modification of The Discovery Plan and Scheduling Order.

2 LR 26-4 governs modifications or extension of this discovery plan and scheduling
3 order. Any stipulation or motion must be made no later than twenty-one (21) days before
4 the expiration of the subject deadline, and comply fully with LR 26-4.

5 The following is a list of the current discovery deadlines and the parties' proposed
6 extended deadlines.

7 **PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	December 14, 2018	April 15, 2019 March 14, 2019
Amendment to Pleadings	October 15, 2018 September 14, 2018	February 15, 2019 December 13, 2018
Interim Status Report	October 15, 2018	February 15, 2019 January 14, 2019
Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	October 15, 2018	February 15, 2019 January 14, 2019
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	November 14, 2018	March 15, 2019 February 12, 2019
Dispositive Motions	January 14, 2019	May 15, 2019 April 15, 2019
Joint Pretrial Order	February 13, 2019	June 17, 2019 May 14, 2019

19 This Request for an extension of time is not sought for any improper purpose or
20 other purpose of delay. Rather, it is sought by the parties solely for the purpose of
21 allowing sufficient time to conduct discovery in this multi-party case and adequately
22 prepare their respective cases for trial.

23 This is the first request for extension of time in this matter. The parties respectfully
24 submit that the reasons set forth above constitute compelling reasons and good cause for
25 the short extension.

