

1 CHARLES R. GOODWIN, ESQ.
 Nevada Bar No. 14879
 2 **GOODWIN LAW GROUP, PLLC**
 3100 W Charleston Blvd
 3 Las Vegas, NV 89102
 Telephone (702) 472-9594
 4 charles@goodwinlawgroup.net
 5 *Attorney for plaintiff Ramon Muric-Dorado*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 RAMON MURIC-DORADO,
 9 Plaintiff,

CASE NO. 2:18-cv-01184-JCM-EJY

10 v.

11 LVMPD, et. al.,

**~~PROPOSED~~ DISCOVERY PLAN AND
SCHEDULING ORDER**

12 Defendants.
13
14
15

16 Plaintiff, Ramon Muric Dorado, (hereafter "Plaintiff") and Defendant LVMPD, et.al.
17 (hereafter "Defendant," collectively with Plaintiff the "Parties"), hereby submit the following
18 Proposed Discovery Plan and Scheduling Order.

19 Pursuant to Local Rule 26-1, the parties submit their proposed discovery plan and
20 scheduling order.

- 21 1. **Pre-Discovery Disclosures:** Pursuant to FRCP Rule 26(a)(1), the parties will make
22 their initial disclosures, including but not limited to any computation(s) of damages,
23 by **Friday November 11th, 2021.**
- 24 2. **Areas of Discovery:** Discovery should include, but not limited to, all claims and
25 defenses allowed pursuant to the Federal Rules of Civil Procedure.
- 26 3. **Discovery Plan:** The parties have agreed to a six (6) month discovery period
27 beginning on the date of September 6, 2021. The deadlines herein have been calculated
28 from that date.

- 1 **4. Discovery Cut-Off Dates:** The parties propose that discovery must be commenced
2 and completed no later than **Monday, March 7, 2022**. 181¹ days after September 6,
3 2021.
- 4 **5. Amending the Pleadings and Adding Parties:** The last day to file motions to amend
5 the pleadings or add parties shall not be later than 90 days prior to the close of
6 discovery. The last date for filing motions to amend the pleadings or add parties shall
7 be **Tuesday, December 7, 2021**.
- 8 **6. FRCP 26(a)(2) Disclosures (Experts):** The last date for the disclosure of expert
9 witness shall be 60 days before the discovery cut-off date. In this action, the last date
10 for the disclosure of experts shall be **Thursday January 6, 2022**. The last date for
11 disclosure of rebuttal experts shall be **Monday, February 7, 2022**.
- 12 **7. Dispositive Motions:** The last date for filing dispositive motions shall not be later
13 than 30 days after the discovery cut-off date. The last day for filing dispositive motions
14 shall be **Wednesday, April 6, 2022**.
- 15 **8. Pre-trial Order:** The Joint Pre-trial Order shall be filed no later than 30 days after the
16 date set for filing dispositive motions. The joint pretrial order shall be filed on or
17 before **Friday, May 6, 2022**. If dispositive motions are filed, the date for filing the
18 Joint Pre-trial Order shall be suspended 30 days after the decision of the dispositive
19 motions or further order of the court.
- 20 **9. Interim Status Reports:** The last day for filing an interim status report shall be 60
21 days before discovery cut-off. The last day for filing the interim status report shall be
22 **Thursday, January 6, 2022**.
- 23 **10. FRCP 26(a)(3) Disclosures:** The disclosures required by FRCP 26(a)(3) and any
24 objections thereto shall be included in the pre-trial order.
- 25 **11. Stipulations Regarding Limitations or Conditions or Additional Discovery:** The
26 parties will proceed to engage in and supplement all discovery as permitted under the
27

28 ¹ The date occurring 180 days after the 26(f) conference falls on Sunday, April 14, 2019. The parties agree to move this deadline to the next judicial day.

1 Federal Rules of Civil Procedure and the Local Court Rules of the District of Nevada,
2 including but not limited to depositions, interrogatories, requests for production of
3 documents, requests for admissions, and expert disclosures.

4 **12. Later Appearing Parties:** A copy of this Discovery Plan and Scheduling Order shall
5 be served on any person served after it is entered or, if additional defendants should
6 appear, within five (5) days of their first appearance. This Discovery Plan and
7 Scheduling Order shall apply to such later-appearing party and/or parties, unless this
8 Court, on motion and for good cause shown, orders otherwise.

9 **13. Extension or Modifications of the Discovery Plan and Scheduling Order:** Local
10 Rule 26-4 governs all applications to extend any of the dates set out herein. Any
11 motion or stipulation to extend a deadline set forth herein shall be received by the
12 Court no later than twenty-one (21) days before the expiration of the subject deadline.

13 \\\
14 \\\
15 \\\
16 \\\
17 \\\
18 \\\
19 \\\
20 \\\
21 \\\
22 \\\
23 \\\
24 \\\
25 \\\
26 \\\
27 \\\

28

14. Statements of Parties' Positions On Points In Dispute or Other Discovery Issues:

None.

DATED this 3rd day of September 2021.

DATED this 3rd day of September 2021.

GOODWIN LAW GROUP, PLLC

KAEMPFER CROWELL

By: /s/ Charles R Goodwin
Charles R. Goodwin, Esq.
Nevada Bar No. 14879
3100 W Charleston Blvd
Las Vegas, NV 89102
Telephone (702) 472-9594
charles@goodwinlawgroup.net
Attorney for plaintiff Ramon Muric-Dorado

By: /s/Lyssa S. Anderson
Lyssa S. Anderson, Esq.
Nevada Bar No. 5781
Ryan W. Daniels, Esq.
Nevada Bar No. 13094
Kristopher John Kalkowski, Esq.
Nevada Bar No. 14892
1980 Festival Plaza Dr. Suite 650
Las Vegas, NV 89135
Telephone (702) 792-7000
landerson@kcnvlaw.com
rdaniels@kcnvlaw.com
kkalkowski@kcnvlaw.com
Attorneys for Defendant LVMPD

DATED this 3rd day of September 2021.

**LAURIA TOKUNAGA GATES & LINN,
LLP**

By: /s/ Paul A Cardinale
Paul A. Cardinale
1755 Creekside Oaks Dr., Ste 240
Sacramento, CA 95833
916-492-2000
916-492-2500 (fax)
pcardinale@ltglaw.net
Attorney for Defendant NaphCare, Inc.

ORDER

IT IS SO ORDERED:



U.S. MAGISTRATE JUDGE

Dated: September 8, 2021