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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RAMON MURIC-DORADO,

Plaintiff,

v.

LVMPD, et. al.,

Defendants.

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

STIPULATION AND ORDER TO EXTEND
DISCOVERY

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between the parties, through their counsel of record, to extend discovery for good cause shown pursuant to LR IA 6-1. The parties agree to extend discovery deadlines in this matter past their current deadlines. This is the second stipulation for extension of time to conduct discovery.

DISCOVERY COMPLETED TO DATE

- The parties have completed the following discovery:
- 1. Defendants served their initial FRCP 26 disclosures.
 - 2. Plaintiff served their initial FRCP 26 disclosures.

DISCOVERY THAT REMAINS TO BE COMPLETED

- 1. Plaintiffs need to serve written discovery requests on defendants.
- 2. Potential deposition of parties and third parties.
- 3. Designate experts.
- 4. Any additional discovery the parties deem necessary.

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**REASONS WHY DISCOVERY COULD NOT BE COMPLETED
WITHIN THE PARAMETERS OF THE DISCOVERY SCHEDULING ORDER**

Plaintiff’s counsel has been severely limited in his ability to speak with plaintiff. Specifically, plaintiff is only allowed to visit with counsel on Monday mornings at 11am for two hours. It has been difficult for plaintiff’s counsel to retrieve documents, review discovery, and obtain signatures from plaintiff because the timeframe for visitation conflicts with mandated court appearances.

Plaintiff’s counsel is pro-bono and does not have the same access to funds as traditional parties in civil suits. It is taking longer to attempt to locate an expert that would be willing to work on reduced fees while at the same time attempting to locate programs that can help supplement expert fees.

PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

	<u>Current</u>	<u>Proposed</u>
1. Close of discovery:	3/7/22	7/6/22
2. Final dates for expert disclosures:		
i. Initial disclosures:	1/6/22	4/6/22
ii. Rebuttal disclosures:	2/7/22	5/7/22
3. Final date to file dispositive motions:	3/2/22	8/5/22
4. Joint Pretrial Order filing deadline	1/3/22	9/5/22

1 DATED this 5th day of January 2022.

DATED this 5th day of January 2022.

2 **GOODWIN LAW GROUP, PLLC**

KAEMPFER CROWELL

3
4 By: /s/ Charles R Goodwin

By: /s/Lyssa S. Anderson

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18 *Attorneys for Defendant LVMPD*

19 DATED this 5th day of January 2022.

20 **LAURIA TOKUNAGA GATES & LINN,**

21 **LLP**

22 By: /s/ Paul A Cardinale

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Attorney for Defendant NaphCare, Inc.

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: January 7, 2022