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14 UNITED STATES DISTRICT COURT

15 CLARK COUNTY, NEVADA

17 LILIA JARRELL,

18 Plaintiff,

19 vs.

20 WAL-MART STORES, INC.; WALMART  
 21 INC. d/b/a WALMART #2593; INLAND  
 22 DIVERSIFIED LAS VEGAS EASTERN  
 23 BELTWAY, LLC; THE INLAND REAL  
 ESTATE GROUP, INC.; INLAND REAL  
 24 ESTATE INVESTMENT CORPORATION;  
 DOES 1 through 100 and ROE  
 25 CORPORATIONS 1 through 100, inclusive,

26 Defendant.

Case No.: 2:18-cv-01219-APG-VCF

**STIPULATION**  
**AND ORDER TO CONTINUE**  
**MOTION IN LIMINE DEADLINE**  
**(FIRST REQUEST)**

27 Plaintiff LILIA JARRELL ("Plaintiff"), by and through her attorneys of record,  
 28 Dennis M. Prince and Angela M. Lee of PRINCE LAW GROUP, and Farhan R. Naqvi



1 and Paul G. Albright of the law firm NAQVI INJURY LAW, and Defendants WAL-  
2 MART STORES, INC.; WALMART INC. d/b/a WALMART #2593 (hereinafter  
3 collectively referred to as “Defendant Walmart”), by and through their attorneys of  
4 record, Robert K. Phillips and Timothy D. Kuhls of the law firm PHILLIPS, SPALLAS  
5 & ANGSTADT, LLC, submit this **STIPULATION AND ORDER TO CONTINUE**  
6 **MOTION IN LIMINE DEADLINE** for the Court’s consideration.

7 In the interest of judicial economy and efficiency, the parties request a brief  
8 continuance of the Motion in Limine deadline. This is the first request to extend the  
9 Motion in Limine deadline, though the Motion in Limine deadline has been previously  
10 altered three times. The first extension was a result of the parties’ stipulation to extend  
11 discovery on October 17, 2018 (ECF 16, 17). The second extension was a result of the  
12 parties’ stipulation to continue trial on October 14, 2020 (ECF 43, 44). The third  
13 extension was a result of the parties’ stipulation to continue trial on February 10, 2021  
14 (ECF 52, 53).

15 The parties have been diligent in this matter, but various upcoming events may  
16 affect the subject Motions in Limine. On July 14, 2021, the parties met and conferred  
17 regarding our respective Motions in Limine pursuant to LR 16-3(a). Although the parties  
18 were able to agree on many evidentiary issues, the parties collectively have more than  
19 30 Motions in Limine that they intend to file. Some of these motions, however, are  
20 dependent upon the Court’s ruling regarding Plaintiff’s Emergency Motion to Substitute  
21 Plaintiff’s Expert Witness Dr. Gross with Dr. Oliveri (ECF 56). The outcome of Plaintiff’s  
22 Motion to Substitute may also affect the Motion in Limine due date. Moreover, there is  
23 an upcoming Master Trial Calendar Scheduling Conference on August 3, 2021, which  
24 may further affect the Motion in Limine due date.

25 A continuance of the Motion in Limine due date will provide additional time  
26 during which the Court may render a ruling on Plaintiff’s Motion to Substitute which  
27 will provide clarity on various Motions in Limine that the parties intend to file.

28



1 Moreover, the continuance will allow the parties to attend the Master Trial Calendar  
2 Scheduling Conference to determine when the trial will be and when the Motions in  
3 Limine will be due in accordance with the trial date. Accordingly, the parties are  
4 requesting a brief two-week extension to file our Motions in Limine from July 23, 2021,  
5 to Monday, August 9, 2021.

6  
7 DATED this 15th day of July, 2021

DATED this 15th day of July, 2021

8 **PRINCE LAW GROUP**

**PHILLIPS, SPALLAS & ANGSTADT**

9 */s/ Dennis M. Prince*

*/s/ Timothy Kuhls*

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26 *Attorneys for Plaintiff*

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28  
**IT IS SO ORDERED:**

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\_\_\_\_\_  
**UNITED STATES DISTRICT JUDGE**

**DATED:** July 16, 2021

