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 on behalf of Plaintiff Gustavo Ramos,
 6 HDSP Inmate #91166

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

9
 10 **Gustavo Ramos**

11 Plaintiff,

12 vs.

13 **Clark County Detention Center, et al.**

14 Defendant(s)

CASE #: 2:19-CV-00124-RFB-VCF

**STIPULATION TO EXTEND
 DISCOVERY DEADLINES, AND
 FULFILLMENT. (Second Request)**

16
 17 This is the second stipulated request for an extension to complete discovery.

18 On February 24, 2020 this court granted the initial stipulated discovery plan, on
 19 May 18, 2020 this court acknowledged a consented to a modification of the initial
 20 discovery plan due to the initial restrictions placed upon the people of the State of
 21 Nevada by the government due to the Covid-19 Pandemic. As of today the Covid-
 22 19 Pandemic continues.

23
 24 With this continuation and the Plaintiff being currently incarcerated at the
 25 Nevada High Desert State Prison, and the elimination of visits (see exhibit 1, <http://>
 26
 27
 28

1 doc.nv.gov/Inmates/Visiting/Home/), until further notice, completing discovery,
2 interviews, depositions, and face-to-face contact being effectively eliminated, even
3 telephone calls are limited in nature, opportunity and time, we are forced to request
4 of this court, and for the benefit of justice, a second extension of time, and a
5 modification of related due dates in order to properly manage the matter.
6
7

8 Therefore, the parties request that ninety (90) days be added to the amended
9 discovery dates, and that currently pending matters be granted the additional time,
10 in order for all sides to address their respective responsibilities.
11

12 The prospective discovery deadlines and associated dates are as follows:

13 Amended Pleadings March 6, 2021

14 Initial Expert Disclosures March 7, 2021

15 Rebuttal Expert Disclosures May 8, 2021

16 Close of Discovery June 12, 2021

17 Dispositive Motions July 13, 2021

18 **Joint Pretrial Order August 13, 2021**

19 If dispositive motions are filed, the deadline
20 for filing the joint pretrial order will be suspended until 30 days after
21 decision on the dispositive motions or further court order.

22 Due to the current state of events, the parties also agree to a ninety (90) day
23 extension to respond to any outstanding discovery obligations in order to work
24 towards moving the matter forward.

25 Additionally, the parties agree to the withdrawal/dismissal of currently filed
26 Motions to Compel.
27
28

1 Jointly Submitted this Date September 22, 2020

2
3 /s/ Warren R. Markowitz, Esq
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24 //

25 //

26 //

27 /s/ Robert W Freeman
28 Robert W Freeman , Jr.
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Lombardo, and Lt. Michael Lusch

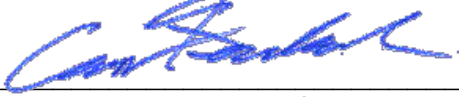
29 /s/ Stephanie A. Barker, Esq.
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37 on behalf of Yolanda King and Jeff
38 Wells

23 <<<<< THE REST OF THE PAGE LEFT INTENTIONALLY BLANK >>>>>

ORDER

Based on the foregoing, it is hereby ordered, adjudged, and decreed, that the proposed discovery dates are approved and adopted.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE

JUDGE DATED: 10-2-2020

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VISITING INFORMATION

Temporary Suspension of Visitation

In the interest of public safety, effective March 7, 2020 and until further notice visitation at all institutions is temporarily suspended, including attorney / legal visits. This is a precautionary effort to protect inmates, staff, and their loved ones.

NDOC is providing eligible inmates two (2) free phone calls per week to mitigate the impacts of this temporary suspension and help inmates stay connected with families, friends, and legal professionals as these connections are essential to the support needed for an inmate to successfully re-enter the community upon release from NDOC.

Inmate Visiting Regulations

DO NOT SEND VISITING APPLICATIONS TO CENTRAL OFFICE - OMD. APPLICATIONS NEED TO BE SENT TO THE INSTITUTION THE INMATE IS CURRENTLY HOUSED. THANK YOU

- [Administrative Regulation 719: Inmate Visitation](#)
- [Visitation Manual updated 8/28/2017](#)
- [Inmate Visiting Application \(11-12\)](#)

Facilities

- [Carlin Conservation Camp \(CCC\)](#)
- [Casa Grande Transitional Housing \(CGTH\)](#)
- [Ely Conservation Camp \(ECC\)](#)
- [Ely State Prison \(ESP\)](#)
- [Florence McClure Women's Correctional Center \(FMWCC\)](#)
- [High Desert State Prison \(HDSP\)](#)
- [Humboldt Conservation Camp \(HCC\)](#)
- [Jean Conservation Camp \(JCC\)](#)
- [Lovelock Correctional Center \(LCC\)](#)
- [Northern Nevada Correctional Center \(NNCC\)](#)
- [Northern Nevada Restitution Center \(NNRC\)](#)
- [Pioche Conservation Camp \(PCC\)](#)
- [Southern Desert Correctional Center \(SDCC\)](#)
- [Stewart Conservation Camp \(SCC\)](#)
- [Three Lakes Valley Conservation Camp \(TLVCC\)](#)
- [Tonopah Conservation Camp \(TCC\)](#)
- [Warm Springs Correctional Center \(WSCC\)](#)
- [Wells Conservation Camp \(WCC\)](#)

Video Visitation

Available for juvenile offenders at Lovelock Correctional Center (LCC) only.

Visitor stations available at Florence McClure Women's Correctional Center (FMWCC) in Las Vegas, NV.

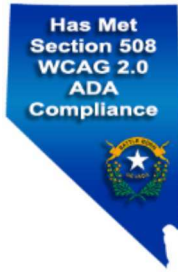
Video visitation registration: <http://thevisitor.icsenforcer.com/index.php/jail-information/44-nvdoc>

Video Visitation Visitor Guide [English](#)

Video Visitation Visitor Guide [Spanish](#)

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