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7 Attorneys for Defendant  
 WYNN LAS VEGAS, LLC

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

12 TIARE RAMIREZ, an individual;  
 13 Plaintiff,  
 14 vs.  
 15 WYNN LAS VEGAS, LLC; DOES I  
 through X; and ROE Corporations XI  
 16 through XX, inclusive;  
 17 Defendant.

Case No. 2:19-cv-01174-APG-DJA

**STIPULATION AND ORDER TO EXTEND  
 DISCOVERY DEADLINES**

**(Fourth Request)**

26-3

18 Pursuant to LR IA 6-1, 6-2, and LR ~~26-4~~, Defendant WYNN LAS VEGAS, LLC.  
 19 (“Defendant”) and Plaintiff TIARE RAMIREZ (“Plaintiff”), by and through their undersigned  
 20 counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order, (ECF No. 38), by  
 21 extending the outstanding discovery deadlines for a period of ninety (90) days.  
 22

23 This is the fourth request for an extension to the Discovery Plan and Scheduling Order in this  
 24 matter. The requested extension is sought in good faith and not for purposes of undue delay. This  
 25 request is submitted at least twenty-one (21) days or more before each deadline set forth below.

**DISCOVERY COMPLETED TO DATE**

27 Both parties have exchanged their initial disclosures required under Fed. R. Civ. P.  
 28 26(a)(1)(A). Plaintiff served her initial disclosures on September 9, 2019 and her first supplemental

1 disclosures on November 1, 2019. Defendant served its initial disclosures on September 10, 2019 and  
2 its first supplemental disclosures on November 1, 2019. Defendant responded to Plaintiff's first sets  
3 of interrogatories and requests for production of documents on November 1, 2019. Plaintiff responded  
4 to Defendant's first sets of interrogatories and requests for production of documents on November 1,  
5 2019.

6 On December 6, 2019, Defendant issued third-party subpoenas for Plaintiff's employment,  
7 education and medical records. Plaintiff objected to and moved to quash the subpoenas for Plaintiff's  
8 employment and education records (ECF No. 23). Defendant withdrew the subpoenas for Plaintiff's  
9 education records but maintained its request for Plaintiff's employment records from Caesars Palace  
10 and Able Baker Brewing. The parties fully briefed the issue regarding the discoverability of Plaintiff's  
11 employment records and on January 31, 2020, Magistrate Judge Albregts granted in part and denied  
12 in part Plaintiff's Motion to Quash Third-Party Subpoenas (ECF No. 26). Plaintiff subsequently filed  
13 Objections to Magistrate Judge Albregts' Order, which District Judge Gordon affirmed by Order dated  
14 March 3, 2020 (ECF No. 32). Thereafter, Defendant issued amended subpoenas to Caesars Palace and  
15 Able Baker Brewing for Plaintiff's employment records in accordance with District Judge Gordon's  
16 Order. Defendant received a response to its subpoena from Caesars Palace timely but Able Baker  
17 Brewing and treating healthcare provider, D. Ted Cohen responded to the respective subpoenas late.

18 **DISCOVERY THAT REMAINS TO BE COMPLETED**

19 Plaintiff anticipates taking the deposition of Defendant Wynn Las Vegas, LLC, pursuant to  
20 Federal Rule of Civil Procedure 30(b)(6). Plaintiff also anticipates taking the depositions of  
21 individuals with knowledge of the facts and circumstances surrounding the allegations in the  
22 Complaint. Such individuals are anticipated to include Jeralynn Makaiwi, Karen Sanchez, Melissa  
23 Espino-Cascos, and Tia Gibson.

24 Defendant anticipates taking the deposition of Plaintiff Tiare Ramirez and perhaps others based  
25 upon the deposition testimony provided.

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