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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TERESA SIVIL,)	CASE NO. 2:20-cv-00244-JAD-EJY
Plaintiff,)	
vs.)	
COUNTRY MUTUAL INSURANCE)	STIPULATION AND ORDER TO
COMPANY, a foreign corporation;)	EXTEND DISCOVERY DEADLINES
DOES I through X; and ROE)	(FIRST REQUEST)
CORPORATIONS I through X,)	
Defendants.)	

Pursuant to LR IA 6-1 and LR II 26-4, the parties request a **sixty (60) day** extension of the close of discovery deadline as set forth below in order to accomplish the depositions of several witnesses to the matter at issue. This stipulation is filed at least 21 days before the earliest deadline sought to be extended, i.e., the close of discovery deadline, and is the parties' first request for an extension of time. In support of this request, the parties inform the Court of the following:

The nature of this action involves a dispute over insurance coverage and allegations of breach of contract, bad faith, unfair trade practices, and declaratory relief.

(a) Discovery completed: the parties have exchanged lists of witnesses and relevant documents and have each propounded and responded to written discovery;

(b) Remaining discovery: the depositions of the parties (Plaintiff Teresa Sivil and the Fed.R.Civ.P. 30(b)(6) witness for Defendant) as well as independent witnesses

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consisting of Melissa Izatt, Sarah Muranaka, and Keith Nordlof.

(c) Reason for discovery not being able to be completed by October 1, 2021 deadline: the parties have been diligent in conducting discovery and the original deadline of October 1, 2021, has not yet passed. However, three of the five depositions needed involve witnesses located outside the State of Nevada. The parties delayed scheduling those depositions due to the COVID 19 pandemic affecting in person depositions and travel. Although there are still pandemic-related difficulties with same, counsel believe that they will be able to proceed using CDC recommended precautions.

(d) Proposed schedule for completing remaining discovery:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Expert Disclosures	CLOSED	Unchanged/past
Rebuttal Expert Disclosures	CLOSED	Unchanged/past
Discovery Cutoff	10/01/2021	12/01/2021
Dispositive Motions	11/01/2021	01/03/2022
Proposed Joint Pretrial Order	12/01/2021	02/01/2022 ¹

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¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.

1 This request for an extension of time seeks sixty (60) additional days to accomplish the
2 out of state depositions and is not sought for any improper purpose including delay.

3 DATED this 9th day of September, 2021.

4 ROGERS, MASTRANGELO, CARVALHO BOWEN LAW OFFICES
5 & MITCHELL

6 /s/ Rebecca Mastrangelo

/s/ Jerome Bowen

7 _____
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12 Attorney for Defendant
13 Country Mutual Insurance Company

Jerome Bowen, Esq.
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Attorneys for Plaintiff

11
12 **ORDER**

13 IT IS SO ORDERED this 9th day of September, 2021.

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16 _____
17 U.S. MAGISTRATE JUDGE

17 SUBMITTED BY:
18 ROGERS, MASTRANGELO, CARVALHO
19 & MITCHELL

20 /s/ Rebecca Mastrangelo

21 _____
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