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5 Attorney for Third-Party Defendant
 6 AMANDA HELLMAN

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

9 PETER J. HELLMAN,
 10 Plaintiff,

11 vs.

12 GREYSTONE NEVADA, LLC; LENNAR
 SALES CORP.; DOES I-X, inclusive, and ROE
 13 CORPORATIONS XI-XX, inclusive,
 14 Defendants.

15 GREYSTONE NEVADA, LLC; and LENNAR
 SALES CORP.,

16 Third-Party Plaintiffs,
 17 vs.

18 AMANDA HELLMAN,
 19 Third-Party Defendant.

CASE NO.: 2:20-cv-00559-JCM-BNW

**STIPULATION AND [PROPOSED] ORDER
 TO EXTEND DISCOVERY DEADLINES**

[FIFTH REQUEST]

21 Third-Party Defendant AMANDA HELLMAN, by and through her attorney of record,
 22 George F. Hand, Esq. of HAND & SULLIVAN, LLC, Plaintiff PETER J. HELLMAN, by and
 23 through his attorney of record, John B. Greene, Esq. of VANNAH & VANNAH, and
 24 Defendant/Third-Party Plaintiffs GREYSTONE NEVADA, LLC and LENNAR SALES CORP.,
 25 by and through their attorneys of record, Amtoj S. Randhawa, Esq. and J. Nathan Owens, Esq. of
 26 NEWMeyer & DILLION LLP, hereby stipulate pursuant to LR IA 6-1, and request the Court to
 27 extend all remaining discovery deadlines by 60 days, as set forth herein.

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1 This is the fifth stipulation for the extension of time for discovery. Good cause exists for
2 the requested extension given that Third-Party Defendant AMANDA HELLMAN recently
3 appeared in this action on July 28, 2021, only five months ago. Considering the complex nature of
4 this case, Mrs. HELLMAN needs additional time to depose witnesses and propound written
5 discovery in order to effectively defend herself against the claims asserted by Defendants/Third-
6 Party Plaintiffs GREYSTONE NEVADA, LLC (“Greystone”) and LENNAR SALES CORP.
7 (“Lennar”).

8 The parties have been working diligently to continue to conduct discovery and believe it
9 judicious to extend the discovery deadlines to allow AMANDA HELLMAN to properly conduct
10 discovery subsequent to her appearance in this case. Therefore, the Parties respectfully request a
11 60-day extension of all current discovery deadlines.

12 As of the date of this Stipulation, the parties have completed the following discovery:

- 13 a. All parties have exchanged initial disclosures per FRCP 26(a);
- 14 b. Defendant/Third-Party Plaintiff Lennar served Plaintiff Peter Hellman with its First
15 Set of Special Interrogatories and Requests for Production of Documents and
16 Plaintiff Peter Hellman served Responses to same;
- 17 c. Plaintiff Peter Hellman served Supplemental Responses to Defendant/Third-Party
18 Plaintiff Lennar’s First Set of Requests for Production;
- 19 d. Plaintiff Peter Hellman served Defendant/Third-Party Plaintiff Lennar with its First
20 Set of Requests for Admission, Requests for Production, and Interrogatories and
21 Defendant Lennar served Responses to same;
- 22 e. Plaintiff Peter Hellman served Defendant/Third-Party Plaintiff Greystone with its
23 First Set of Interrogatories, Requests for Admission, and Requests for Production
24 and Defendant Greystone served Responses to same;
- 25 f. Defendant/Third-Party Plaintiff Lennar served Plaintiff Peter Hellman with its
26 Second Set of Requests for Production of Documents and Special Interrogatories
27 and Plaintiff Peter Hellman responded to same;

- 1 g. Plaintiff Peter Hellman served Defendant/Third-Party Plaintiff Lennar with its
2 Second Set of Requests for Production and Defendant Lennar served Responses to
3 same;
- 4 h. Defendant/Third-Party Plaintiff Lennar served Third-Party Defendant Amanda
5 Hellman with its First Set of Requests for Production of Documents and Special
6 Interrogatories and Third-Party Defendant Amanda Hellman served Responses to
7 same;
- 8 i. Third-Party Defendant Amanda Hellman made a Demand for Prior Pleadings and
9 Discovery to Defendants/Third-Party Plaintiffs Lennar and Greystone and
10 Defendants/Third-Party Plaintiffs Lennar and Greystone served a Response to same;
- 11 j. Defendant/Third-Party Plaintiff Lennar served Third-Party Defendant Amanda
12 Hellman with its Second Set of Requests for Production of Documents and Third-
13 Party Defendant Amanda Hellman served Responses to same;
- 14 k. Defendant/Third-Party Plaintiff Lennar served Plaintiff Peter Hellman with its Third
15 Set of Requests for Production of Documents and Plaintiff Peter Hellman served
16 Responses to same;
- 17 l. Third-Party Defendant Amanda Hellman served Third-Party Plaintiffs Lennar and
18 Greystone with its First Set of Requests for Production of Documents and
19 Interrogatories and Third-Party Plaintiffs Lennar and Greystone served Responses to
20 same;
- 21 m. Defendant/Third-Party Plaintiff Lennar served Supplemental Responses to Plaintiff
22 Peter Hellman's Second Set of Requests for Production of Documents;
- 23 n. Defendant/Third-Party Plaintiff Greystone served Plaintiff Peter Hellman with its
24 First Set of Requests for Production of Documents and Interrogatories and Plaintiff
25 Peter Hellman served Responses to same;
- 26 o. Third-Party Defendant Amanda Hellman and Defendants/Third-Party Plaintiffs
27 Lennar and Greystone met and conferred regarding various discovery issues;
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- 1 p. Third-Party Defendant Amanda Hellman served Third-Party Plaintiffs Lennar and
- 2 Greystone with its First Set of Supplemental Interrogatories;
- 3 q. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 4 deposition of Plaintiff Peter Hellman;
- 5 r. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 6 deposition of Lars Bangen;
- 7 s. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 8 deposition of Third-Party Defendant Amanda Hellman;
- 9 t. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 10 deposition of Dr. Kimberly Adams;
- 11 u. Plaintiff Peter Hellman has completed the deposition of Thomas Dome individually
- 12 and as the FRCP 30(b)(6) witness for Defendant/Third-Party Plaintiff Greystone;
- 13 v. Plaintiff Peter Hellman has completed the deposition of Melissa Flores individually
- 14 and as the FRCP 30(b)(6) witness for Defendant/Third-Party Plaintiff Lennar;
- 15 w. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 16 Independent Medical Evaluation (“IME”) of Plaintiff Peter Hellman;
- 17 x. Defendants/Third-Party Plaintiffs Lennar and Greystone have completed the
- 18 deposition of Dr. Jessica Knirk;
- 19 y. Defendants/Third-Party Plaintiffs Lennar and Greystone served their Initial Expert
- 20 Disclosures;
- 21 z. Plaintiff Peter Hellman served his Initial Expert Disclosures; and
- 22 aa. Defendants/Third-Party Plaintiffs Lennar and Greystone served their Rebuttal
- 23 Expert Disclosures.

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1 In light of the circumstances set forth above, the parties hereby stipulate and request to
 2 continue the dates set forth by the Court as follows:

CURRENT DISCOVERY DEADLINES	Current	Joint Proposed Amended
1. Close of Discovery	01/06/2022	03/07/2022
2. Final Date to File Motions to Amend Pleadings or Add Parties	10/08/2021	No Change
3. Final Dates for Expert Disclosures		
(a) Initial Disclosures	11/07/2021	No Change
(b) Rebuttal Disclosures	12/07/2021	No Change
4. Dispositive Motions	02/05/2022	04/06/2022
5. Joint Pretrial Order	03/07/2022	05/06/2022

ORDER

15 Upon Stipulation of the parties;

16 IT IS HEREBY ORDERED that the discovery deadlines be extended as follows:

1. Close of Discovery	03/07/2022
2. Final Date to File Motions to Amend Pleadings or Add Parties	10/08/2021
3. Final Dates for Expert Disclosures	
(a) Initial Disclosures	11/07/2021
(b) Rebuttal Disclosures	12/07/2021
4. Dispositive Motions	04/06/2022
5. Joint Pretrial Order	05/06/2022

ORDER

IT IS SO ORDERED

DATED: 12:03 pm, January 03, 2022



BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

1 Dated: December 29, 2021

Dated: December 29, 2021

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/s/ George F. Hand
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GREYSTONE NEVADA, LLC and
LENNAR SALES CORP

Dated: December 29, 2021

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