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

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<p>10 <b>LISA A. BRYANT,</b></p> <p>11                                   Plaintiff,</p> <p>12                                   v.</p> <p>13 <b>MADISON MANAGEMENT SERVICES,</b></p> <p>14 <b>LLC, and WALDMAN &amp; PORRAS, PLLC,</b></p> <p>15                                   Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>Case No.: 2:20-cv-00594-JAD-EJY</p> <p><del>[PROPOSED]</del> <b>STIPULATION AND</b></p> <p><b>ORDER TO EXTEND DISCOVERY</b></p> <p><b>[FIRST REQUEST]</b></p>
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19 Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs Jeffrey K. Engler and

20 Katherine M. Sennes-Engler (“Plaintiffs”) and CMG Mortgage Inc. d/b/a CMG Financial

21 (“CMG”) (collectively the “Parties”), by and through their attorneys, hereby stipulate to extend

22 discovery deadlines and other deadlines in the March 11, 2020 Scheduling Order (ECF No. 24)

23 as follows:

24 **1. Completed Discovery.**

25 The parties have exchanged initial disclosures. Plaintiff has served written discovery.

26 **2. Remaining Discovery.**

27 Written discovery responses from Defendants and the parties’ depositions.

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3 **3. Good Cause.**

4 On October 5, 2020, Defendants filed a Motion for Extension of Time to Responds to  
5 Discovery Requests (“Motion for Extension”) because Defendants are working remotely and on a  
6 reduced staff due to the Covid 19 pandemic. *See* ECF No. 25. On October 21, 2020, the Court  
7 granted Defendants’ Motion for Extension and Defendants’ discovery responses are now due on  
8 November 4, 2020. *See* ECF No.26.

9 Thus, the parties are seeking a 90-day extension to ensure that the pending discovery can  
10 be completed without requesting additional time. This stipulation is made in good faith, is not  
11 interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not  
12 been set at this time.

13 **5. Current Discovery Deadlines.**

- 14 • Discovery Cutoff: **January 5, 2021**
- 15 • Deadline to Amend Pleadings: **October 7, 2020**
- 16 • Deadline to Disclose Initial Expert Disclosures: **November 6, 2020**
- 17 • Deadline to Disclose Rebuttal Expert Disclosures: **December 7, 2020**
- 18 • Dispositive Motion Deadline: **February 4, 2021**
- 19 • Joint Proposed Pretrial Order: **March 8, 2021**

20 **6. Proposed Discovery Deadlines.**

- 21 • Discovery Cutoff: **April 5, 2021**
- 22 • Deadline to Amend Pleadings: **January 7, 2021**
- 23 • Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- 24 • Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- 25 • Dispositive Motion Deadline: **May 4, 2021**
- 26 • Joint Proposed Pretrial Order: **June 8, 2021**

27 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause  
28 supports this request to extend discovery;

1 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
2 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

3 The August 19, 2020 Scheduling Order shall be amended as follows:

- 4 • Discovery Cutoff: **April 5, 2021**
- 5 • Deadline to Amend Pleadings: **January 7, 2021**
- 6 • Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- 7 • Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- 8 • Dispositive Motion Deadline: **May 4, 2021**
- 9 • Joint Proposed Pretrial Order: **June 8, 2021**

10 **IT IS SO STIPULATED.**

11  
12 DATED: October 25, 2020

DATED: October 25, 2020

13 FREEDOM LAW FIRM, LLC

WALDMAN & PORRAS, PLLC

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15 By: /s/ George Haines

By: /s/ Nicholas M. Porras

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**ORDER GRANTING**

**STIPULATION TO EXTEND DISCOVERY**

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED**  
**THAT** the August 19, 2020 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **April 5, 2021**
- Deadline to Amend Pleadings: **January 7, 2021**
- Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- Dispositive Motion Deadline: **May 4, 2021**
- Joint Proposed Pretrial Order: **June 8, 2021**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: October 27, 2020