

1 George Haines, Esq.
 Nevada Bar No. 9411
 2 FREEDOM LAW FIRM
 3 8985 S. Eastern Avenue, Ste. 350
 Beltway Corporate Center
 4 Las Vegas, NV 89123
 Telephone:702.880.5554
 5 ghaines@freedomlegalteam.com
 6 *Counsel for Plaintiff Lisa A. Bryant*

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

9
 10 **LISA A. BRYANT,**

11 Plaintiff,

12 v.

13 **MADISON MANAGEMENT SERVICES,**
 14 **LLC, and WALDMAN & PORRAS, PLLC,**

15 Defendants.

:
 : Case No.: 2:20-cv-00594-JAD-EJY

:
 :
 :
 :
 : ~~[PROPOSED]~~ **STIPULATION AND**
 : **ORDER TO STAY DISCOVERY AND**
 : **SCHEDULE SETTLEMENT**
 : **CONFERENCE**

16 : **[FIRST REQUEST]**
 17 :
 18 :

19 Pursuant to Local Rule 16-5, Plaintiff, Lisa Bryant, and Defendants, Madison Management
 20 Services, LLC, and Waldman & Porras, PLLC, (collectively known as the “Parties) by and
 21 through their attorneys, hereby stipulate to stay all discovery deadlines and other deadlines in the
 22 February 1, 2021 Scheduling Order (ECF No. 39) for 60 days pending mediation and settlement
 23 discussions.

24 **1. Completed Discovery.**

25 The parties have exchanged initial disclosures. Parties have served written discovery.

26 **2. Remaining Discovery.**

27 Written discovery responses from Plaintiff and the parties’ depositions.
 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Good Cause.

The parties believe that this case is ripe for mediation at this time and are seeking a 60-day stay all discovery deadlines and other deadlines. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not been set at this time.

4. Current Discovery Deadlines.

- Discovery Cutoff: **June 5, 2021**
- Deadline to Amend Pleadings: **March 17, 2021**
- Deadline to Disclose Initial Expert Disclosures: **April 16, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **May 17, 2021**
- Dispositive Motion Deadline: **July 15, 2021**
- Joint Proposed Pretrial Order: **August 16, 2021**

5. Proposed Discovery Deadlines.

- Discovery Cutoff: **August 5, 2021**
- Deadline to Amend Pleadings: **May 17, 2021**
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
- Dispositive Motion Deadline: **September 15, 2021**
- Joint Proposed Pretrial Order: **October 16, 2021**

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

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

The February 1, 2021 Scheduling Order shall be amended as follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- Discovery Cutoff: **August 5, 2021**
- Deadline to Amend Pleadings: **May 17, 2021**
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
- Dispositive Motion Deadline: **September 15, 2021**
- Joint Proposed Pretrial Order: **October 16, 2021**
-

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
 HEREBY STIPULATED AND AGREED, by and between the Parties that this matter shall be
 scheduled for Court Mediation/Settlement Conference on a future date selected by the Court that
 is at least 30-days from the filing of this Stipulation and Order to Stay Discovery and Schedule
 Settlement Conference.

IT IS SO STIPULATED.

DATED: February 22, 2021

DATED: February 22, 2021

FREEDOM LAW FIRM, LLC

WALDMAN & PORRAS, PLLC

By: /s/ George Haines
 GEORGE HAINES, ESQ.
 Nevada Bar No.: 9411
 8985 S. Eastern Ave., Suite 350
 Las Vegas, NV 89123
 Attorney for Plaintiff
 LISA BRYANT

By: /s/ Nicholas M. Porras
 NICOLAS M. PORRAS, ESQ.
 Nevada Bar No.: 12849
 201 West Liberty Street, Suite 207
 Reno, NV 89501
 Attorney for Defendants
 MADISON MANAGEMENT SERVICES,
 LLC, AND PORRAS, PLLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER GRANTING

STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED THAT** the February 1, 2021 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **August 5, 2021;**
- Deadline to Amend Pleadings: **May 17, 2021;**
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021;**
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021;**
- Dispositive Motion Deadline: **September 15, 2021; and**
- Joint Proposed Pretrial Order: **October 16, 2021.**

IT IS FURTHER ORDERED that the Court will issue a separate order scheduling the settlement conference.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: February 25, 2021