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*Attorney for Plaintiff,
Christopher Petras*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER PETRAS,

Plaintiff,

V.

NAVY FEDERAL CREDIT UNION; JPMORGAN CHASE BANK, NATIONAL ASSOCIATION; EQUIFAX INFORMATION SERVICES LLC; AND, EXPERIAN INFORMATION SOLUTIONS, INC.

Defendant.

KIND LAW
Michael Kind, Esq. (13903)
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Case No.: 20-cv-874-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER REGARDING
DEPOSITION OF MITCHELL
TAUBMAN, PH.D.**

HON. BRENDA WEKSLER

1
2 **TO THIS COURT AND TO ALL PARTIES AND THEIR RESPECTIVE**
3 **ATTORNEYS OF RECORD:**

4 WHEREAS, this Court issued its Scheduling Order on July 8, 2020,
5 ECF No. 18;

6 WHEREAS, this Court extended said dates on October 14, 2020, ECF
7 No. 37; December 11, 2020, ECF No. 52; and, April 30, 2021, ECF No. 63;

8 WHEREAS, the Parties will complete all discovery aside from the
9 deposition of Plaintiff's expert Mitchell Taubman, Ph.D. by the current
10 discovery deadline of June 7, 2021;

11 WHEREAS, the Parties previously agreed for Dr. Taubman to be
12 deposed on June 4, 2021, and Experian noticed Dr. Taubman for the date of
13 June 4, 2021;

14 WHEREAS, Dr. Taubman now has a conflict on June 4, 2021;

15 WHEREAS, the Parties have attempted to select a date for Dr.
16 Taubman's deposition within the discovery cut off but have been unable to
17 find a mutually agreeable date that works for all counsel and Dr. Taubman;

18 WHEREAS, the Parties jointly request this Court permit Defendants
19 JPMORGAN CHASE BANK, NATIONAL ASSOCIATION ("Chase"); and,
20 EXPERIAN INFORMATION SOLUTIONS, INC. ("Experian") to depose
21 Dr. Taubman on June 8, 2021, after the close of discovery.

22 WHEREAS, the Parties do not seek to change any other dates in the
23 operative Scheduling Order through this Stipulation nor is any additional
24 discovery permitted after the current discovery cut-off, which the exception
25 of Dr. Taubman's deposition.

1 Date: June 2, 2021

LOKER LAW, APC

2
3 By: /s/ Matthew M. Loker
4 MATTHEW M. LOKER, ESQ.
5 ATTORNEY FOR PLAINTIFF

6 **NAYLOR & BRASTER**

7 By: /s/ Jennifer L. Braster
8 JENNIFER L. BRASTER, ESQ.
9 ATTORNEY FOR DEFENDANT, EXPERIAN

10 **BALLARD SPAHR LLP**

11
12 By: /s/ Joel E. Tasca
13 JOEL E. TASCA, ESQ.
14 ATTORNEY FOR DEFENDANT, CHASE

15 **ORDER**

16 The above-set stipulated agreement to depose Mitchell Taubman, Ph.D. on
17 June 8, 2021 is granted.

18
19 IT IS SO ORDERED:

20 
21

22 UNITED STATES MAGISTRATE JUDGE

23 June 4, 2021
24 DATED: _____