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10 UNITED STATES DISTRICT COURT11  
12 DISTRICT OF NEVADA13  
14 KATHRYN KELLY, an individual,15 v.  
16 Plaintiff,17 WALMART, INC.; DOES I - X, and ROE  
18 Corporations I - X, inclusive,

19 Defendants.

20 CASE NO. 2:20-cv-01129-GMN-EJY

21 **STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY DEADLINES**22 **[THIRD REQUEST]**

23 Plaintiff KATHRYN KELLY (hereinafter "Plaintiff") and Defendant WALMART INC.  
24 (hereinafter "Defendant" or "Walmart"), by and through their respective counsel of record, do  
25 hereby stipulate to extend the discovery deadlines in the current scheduling order and discovery  
26 plan in this matter for a period of forty-five (45) days for the reasons explained herein.

27 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the third such discovery  
28 extension requested in this matter.

29 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested  
30 extension. The parties agree, pending the Court's approval, to extend discovery deadlines, and  
31 stipulate that the request is appropriate. Counsel for Plaintiff, Mahna Pourshaban, Esq., has  
32 fallen ill with Covid, causing a temporary impairment in her ability to sufficiently proceed in the  
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1 prosecution of this matter, as it relates to retention and disclosure of expert witnesses.

2 The parties have acted in good faith to request this extension and have no intent, nor  
3 reason, to delay the resolution of this matter.

4 **NEW DISCOVERY DEADLINES**

5 Expert Disclosure Deadline:

6 Currently: January 15, 2021

7 Proposed: **March 1, 2021**

8 Rebuttal Expert Disclosure Deadline:

9 Currently: February 15, 2021

10 Proposed: **April 1, 2021**

11 Discovery Cut-Off Date:

12 Currently: March 16, 2021

13 Proposed: **April 2, 2021 April 30, 2021**

14 Dispositive Motion Deadline:

15 Currently: April 15, 2021

16 Proposed: **May 28, 2021**

17 Proposed Joint Pre-Trial Deadline:

18 Currently: May 13, 2021

19 Proposed: **June 25, 2021**

20 All other deadlines dates remain the same.

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GINA CORENIA  
& ASSOCIATES

1           If this extension is granted, all anticipated additional discovery should be concluded  
2 within the stipulated deadline. This request for extension deadline is made by the parties in good  
3 faith and not for the purpose of delay.

4           DATED this 6<sup>th</sup> day of January, 2021.

5           GINA CORENA & ASSOCIATES

6           */s/ Mahna Pourshaban*

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8           Mahna Pourshaban, Esq.  
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10           300 South Fourth St., Suite 1250  
11           Las Vegas, NV 89101  
12           Attorney for Plaintiff

13           DATED this 8<sup>th</sup> day of January, 2021.

14           PHILLIPS, SPALLAS & ANGSTADT, LLC

15           */s/ Latisha Robinson*

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17           Latisha Robinson, Esq.  
18           Nevada Bar No. 15314  
19           504 S. Ninth St.  
20           Las Vegas, NV 89101  
21           Attorney for Defendant

22           **IT IS SO ORDERED; provided, however, that**  
23           **the close of discovery shall be April 30,**  
24           **2021, rather than the April 2, 2021 date**  
25           **stated above.**

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28           **UNITED STATES MAGISTRATE JUDGE**

29           **Dated: January 8, 2021**

30           GINA CORENA  
31           & ASSOCIATES