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8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 KATHRYN KELLY, an individual,
12 Plaintiff,

13 v.

14 WALMART, INC.; DOES I - X, and ROE
15 Corporations I - X, inclusive,
16 Defendants.

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

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[THIRD REQUEST]

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

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

24 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested
25 extension. The parties agree, pending the Court's approval, to extend discovery deadlines, and
26 stipulate that the request is appropriate. Counsel for Plaintiff, Mahna Pourshaban, Esq., has
27 fallen ill with Covid, causing a temporary impairment in her ability to sufficiently proceed in the
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GINA CORENA
& ASSOCIATES

prosecution of this matter, as it relates to retention and disclosure of expert witnesses.

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

NEW DISCOVERY DEADLINES

Expert Disclosure Deadline:

Currently: January 15, 2021

Proposed: **March 1, 2021**

Rebuttal Expert Disclosure Deadline:

Currently: February 15, 2021

Proposed: **April 1, 2021**

Discovery Cut-Off Date:

Currently: March 16, 2021

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

Dispositive Motion Deadline:

Currently: April 15, 2021

Proposed: **May 28, 2021**

Proposed Joint Pre-Trial Deadline:

Currently: May 13, 2021

Proposed: **June 25, 2021**

All other deadlines dates remain the same.

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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 6th day of January, 2021.

DATED this 8th day of January, 2021.

5 GINA CORENA & ASSOCIATES

PHILLIPS, SPALLAS & ANGSTADT, LLC

6 */s/ Mahna Pourshaban*

/s/ Latisha Robinson

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12 **IT IS SO ORDERED; provided, however, that**
13 **the close of discovery shall be April 30,**
14 **2021, rather than the April 2, 2021 date**
15 **stated above.**

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18 **UNITED STATES MAGISTRATE JUDGE**

19 **Dated: January 8, 2021**
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