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 8 EDUCATIONAL GROUP, LLC, ARAMARK
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 9 ARAMARK SPORTS AND
 ENTERTAINMENT GROUP, LLC, ARAMARK
 10 SERVICES, INC.

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

14 NATALIE RUISI,
 15 Plaintiff,
 16 v.

Case No. 2:20-cv-01544-JCM-VCF

**STIPULATION AND ORDER TO
 EXTEND DEADLINES
 (FIRST REQUEST)**

Trial Date: None Set

17 ARAMARK SPORTS AND
 18 ENTERTAINMENT SERVICES, LLC, a
 Foreign Limited Liability Company;
 19 ARAMARK CAMPUS, LLC, a Foreign
 Limited Liability Company; ARAMARK
 20 EDUCATIONAL GROUP, LLC, a Foreign
 Limited Liability Company; ARAMARK
 21 EDUCATIONAL SERVICES, LLC, a Foreign
 Limited Liability Company; ARAMARK
 22 SPORTS AND ENTERTAINMENT GROUP,
 LLC, a Foreign Limited Liability Company;
 23 ARAMARK SERVICES, INC., a Foreign
 Corporation; and, ROE Business Organizations
 24 I-X; and DOE INDIVIDUALS I-X, Inclusive,
 25 Defendants.

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1 Pursuant to LR IA 6-1, LR IA 6-2 and LR 26-3, and for good cause shown, Plaintiff
2 Natalie Ruisi, and Defendants, ARAMARK SPORTS AND ENTERTAINMENT
3 SERVICES, LLC, ARAMARK CAMPUS, LLC, ARAMARK EDUCATIONAL GROUP,
4 ~~EDUCATIONAL SERVICES, LLC, ARAMARK SPORTS AND ENTERTAINMENT GROUP,~~
5 LLC, ARAMARK SERVICES, INC. (herein “the parties”), by and through their respective counsel
6 of record, hereby stipulate and agree to and jointly move this Honorable Court for an order to
7 continue discovery by ninety (90) days as indicated below. This is the first request for an extension
8 of time to complete discovery. This request is being made within 21-days of the expiration of the
9 current discovery period set for February 15, 2021. ECF No. 9.

10 **A. DISCOVERY COMPLETED TO DATE**

11 **The parties have produced the following disclosures:**

12 **1. Plaintiff served the following disclosures:**

13 a. Initial Disclosures on September 28, 2020.

14 **2. Defendants served the following disclosures:**

15 a. Initial Disclosures on September 30, 2020;

16 b. Supplemental Disclosures on November 6, 2020, December 4, 2020, and
17 December 14, 2020.

18 **The parties have completed the following written discovery:**

19 **Plaintiff served the following written discovery requests on September 16, 2020:**

20 1. Plaintiff’s First Set of Interrogatories to Defendant Aramark Sports and
21 Entertainment, LLC. Defendant responded on November 6, 2020 and supplemented
22 its responses on December 14, 2020.

23 2. Plaintiff’s first set of Requests for Document and First Set of Request for Production
24 of Documents to Defendant Aramark Sports and Entertainment, LLC. Defendant responded
25 on November 6, 2020 and supplements its responses on December 14, 2020.

26 **Defendant served the following written discovery requests on January 15, 2021:**

27 1. Defendant’s First Set of Interrogatories to Plaintiff

28 2. Defendant’s First Set of Requests for Admission to Plaintiff

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3. Defendant’s First Set of Request for Production of Documents to Plaintiff.

The parties have not taken any depositions.

B. DISCOVERY REMAINING TO BE COMPLETED

1. Depositions of parties, non-parties, percipient, and corporate witnesses;
2. Written discovery;
3. Issuance of Subpoenas;
4. The parties anticipate that supplemental written discovery may be needed once the parties complete depositions.

C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES

A scheduling order can be modified "for good cause and with the judge's consent." FRCP 16(b)(4). "A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted." LR IA 6-1 (a). "District courts should generally allow amendments of pre-trial orders when 'no substantial injury will be occasioned to the opposing party, the refusal to allow the amendment might result in injustice to the movant, and the inconvenience to the court is slight.'" *Campbell Industries v. M/V Gemini*, 619 F.2d 24, 27-28 (9th Cir. 1980) (quoting *Angle v. Sky Chef, Inc.*, 535 F.2d 492, 495 (9th Cir. 1976); *Sherman v. United States*, 462 F.2d 577, 579 (5th Cir. 1972)). Here, as discussed below, there is no dispute among the parties that an extension would cause any injury or injustice, and that a refusal of extension could prejudice the parties. Additionally, no trial date is currently set. Therefore, the stipulated request for an extension should be granted.

The parties are actively conducting discovery and have engaged in meet and confers to resolve disputes before seeking Court intervention. However, the parties have engaged in motion practice, most recently having appeared before the Court on January 8, 2021 to resolve several discovery disputes. Moreover, COVID-19 has presented additional challenges the parties have had to navigate. The parties agree that this matter should be resolved on the merits. To that end, the parties continue to pursue discovery and their attempts to resolve discovery disputes short of Court intervention.

As a result, the parties herein request that the current deadlines be extended by 90 days. The

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1 parties are also amenable to participate in a telephonic conference with the Court if necessary, to
2 further discuss the bases for the requested 90-day extension of deadlines.

3 **D. CURRENT SCHEDULE TO COMPLETE REMAINING DISCOVERY:**

4 Rebuttal Expert Disclosures: January 18, 2021
5 Close of Discovery: February 15, 2021
6 Dispositive Motions: March 17, 2021
7 Joint Pre-Trial Order: April 16, 2021

8 **E. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

9 **Rebuttal Expert Disclosures: April 19, 2021**
10 **Close of Discovery: May 17, 2021**
11 **Dispositive Motions: June 15, 2021**
12 **Joint Pre-Trial Order: July 15, 2021**

If dispositive motions are filed, the deadline
for filing the joint pretrial order will be
suspended until 30 days after
decision on the dispositive motions or
further court order.

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1 **F. CURRENT TRIAL DATE:**

2 No trial is yet scheduled in this matter. A joint proposed pretrial order is due on April 16,
3 2021. The parties seek additional time so that the same proposed pretrial order is due July 15, 2021
4 or 30 days after this Court's ruling on dispositive motions.

5 **G. REQUEST NUMBER:**

6 This is the **first** request for an extension of time to complete discovery. Wherefore, the
7 parties respectfully request that the Court grant this request to extend the discovery deadlines as
8 outlined above.

9 **IT IS SO STIPULATED.**

10 DATED this 22nd day of January 2021.

DATED this 22nd day of January 2021.

11 **WOOD, SMITH, HENNING & BERMAN**

KEMP AND KEMP

12 */s/ Susana Santana*

/s/ Victoria L. Neal

13 By: _____

By: _____

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ARAMARK SPORTS AND
ENTERTAINMENT GROUP, LLC,
ARAMARK SERVICES, INC.

Attorneys for Plaintiff,
NATALIE RUISI

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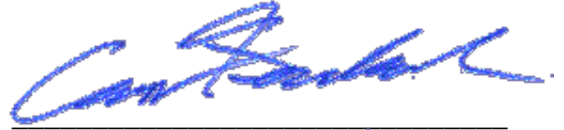
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ORDER

HAVING CONSIDERED THE FOREGOING STIPULATION OF COUNSEL, AND GOOD CAUSE APPEARING, THE DISCOVERY DEADLINES ARE AMENDED AS SET FORTH ABOVE.

DATED: January 25, 2021.



**US MAGISTRATE JUDGE
CAM FERENBACH**

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