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10 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 ELVIA WILLIAS, an individual,
12 Plaintiff,

13 v.

14 99 CENTS ONLY STORES, LLC., and; DOES 1
15 through 100; and ROE CORPORATION 101
16 through 200, inclusive,
17 Defendant(s).

Case No.: 2:22-cv-139-APG-BNW

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
DISCOVERY DEADLINES
[SECOND REQUEST]**

18 Plaintiff, Elvia Williams, by and through her counsel of record, the law firm of
19 **Bernstein & Poisson** and Defendant, 99 Cents Only Stores, by and through its attorneys
20 of record, hereby stipulate and request to extend the respective Discovery Deadlines in this
21 case as follows:

22 **I. DISCOVERY COMPELTED TO DATE**

23 All parties have served disclosures of documents and witnesses. All parties have
24 served and responded to interrogatories, requests for production of documents, and
25 request for admissions. The deposition of Plaintiff has been completed.

26 **DISCOVERY REMAINING**

- 27
28 1. Deposition of Defendant or 30(b)(6)

1 2. Independent Medical Examine of Plaintiff

2 3. Expert Disclosures

3 **II. THE REASONS WHY THE DISCOVERY REMANING CANNOT BE**
4 **COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY**
5 **ORDER**

6 The parties have diligently been obtaining the necessary discovery in this matter,
7 however, due to the COVID-19 restrictions and delays, some discovery, including
8 depositions of non-party witnesses have not been able to be completed. Accordingly, the
9 parties request a 60-day extension of the discovery deadlines.

10 **III. CURRENT DEADLINES**

- 11 1. November 15, 2022 – close of discovery.
12 2. Closed – final date to amend pleadings and add parties.
13 3. September 16, 2022 – final date to make expert disclosures.
14 4. October 17, 2022 – final date to make rebuttal expert disclosures.
15 5. December 15, 2022 – final date to file dispositive motions.

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IV. Proposed Schedule For Completing All Remaining Discovery

1. January 13, 2022 – close of discovery.
2. Closed – final date to amend pleadings and add parties.
3. November 15, 2022 – final date to make expert disclosures.
4. December 16, 2022 – final date to make rebuttal expert disclosures.
5. February 13, 2023 – final date to file dispositive motions.

BERNSTEIN & POISSON

PERRY, SPANN, & WESTBROOK, P.C

DATED: SEPTEMBER 14, 2022

DATED: SEPTEMBER 14, 2022

/s/ Amber N. King
Scott L. Poisson, Esq.
Nevada Bar No.: 10188
Amber N. King, Esq.
Nevada Bar No.: 14070
700 South Jones Blvd.,
Las Vegas, Nevada 89107
Attorneys for Plaintiff

/s/ Lew Brandon, Jr.
Lew Brandon, Jr., Esq.
Nevada Bar No. 5880
Andrew Guzik, Esq.
Nevada Bar No. 12758
139 E. Warm Springs Road
Las Vegas, NV 89119
Attorneys for Defendant

ORDER

IT IS ORDERED that ECF No. 15 is GRANTED in part and DENIED in part. It is granted in all respects except that the discovery cut off shall be January 13, 2023.

IT IS SO ORDERED

DATED: 1:36 pm, September 19, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

Sabina Damelas

From: Andrew Guzik <a.guzik@bsnv.law>
Sent: Wednesday, September 14, 2022 11:47 AM
To: Sabina Damelas; Amber King
Cc: April Rufus; Maybelline Valle; Homero Gonzalez
Subject: RE: Elvia Williams v. 99 Cents Only Stores

You can add my electronic signature to the stipulation. Thanks

ANDREW GUZIK, ESQ.
BRANDON | SMERBER LAW FIRM
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From: Maybelline Valle <M.Valle@bsnv.law>
Sent: Wednesday, September 14, 2022 9:52 AM
To: Andrew Guzik <a.guzik@bsnv.law>; Homero Gonzalez <H.Gonzalez@bsnv.law>
Cc: April Rufus <a.rufus@bsnv.law>
Subject: FW: Elvia Williams v. 99 Cents Only Stores

Please see attached proposed SAO to Extend Discovery.

Best Regards,

Maybelline Valle, Legal Assistant to
Lew Brandon, Jr. Esq.
Andrew Guzik, Esq.
Homero Gonzalez, Esq.
David Spurlock Jr., Esq.
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From: Sabina Damelas <Sabina@vegashurt.com>
Sent: Wednesday, September 14, 2022 9:38 AM
To: Maybelline Valle <M.Valle@bsnv.law>
Cc: Amber King <amber@vegashurt.com>
Subject: FW: Elvia Williams v. 99 Cents Only Stores