

1 Scott L. Poisson, Esq.  
2 Nevada Bar No.: 10188

3 Amber N. King, Esq.  
4 Nevada Bar No.: 14070

**BERNSTEIN & POISSON**  
5 700 South Jones  
6 Las Vegas, Nevada 89107  
(702) 256-4566  
(702) 256-6280 fax  
7 Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**  
9  
**DISTRICT OF NEVADA**

10 ELVIA WILLIAS, an individual,

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

11 Plaintiff,

12 v.

13 99 CENTS ONLY STORES, LLC., and; DOES 1  
14 through 100; and ROE CORPORATION 101  
15 through 200, inclusive,

16  
**STIPULATION AND PROPOSED  
ORDER FOR EXTENSION OF  
DISCOVERY DEADLINES  
[SECOND REQUEST]**

17 Defendant(s).

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 COMPELLED 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)

2. Independent Medical Examine of Plaintiff
3. Expert Disclosures

II. **THE REASONS WHY THE DISCOVERY REMANINING CANNOT BE  
COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY  
ORDER**

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

### **III. CURRENT DEADLINES**

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

///

111

111

111

///

///

111

111

111

111

111

111

1           **IV. Proposed Schedule For Completing All Remaining Discovery**

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

8           **BERNSTEIN & POISSON**

8           **PERRY, SPANN, & WESTBROOK, P.C**

9           **DATED: SEPTEMBER 14, 2022**

9           **DATED: SEPTEMBER 14, 2022**

12           \_\_\_\_\_  
12           */s/ Amber N. King*  
12           Scott L. Poisson, Esq.  
13           Nevada Bar No.: 10188  
13           Amber N. King, Esq.  
14           Nevada Bar No.: 14070  
15           700 South Jones Blvd.,  
15           Las Vegas, Nevada 89107  
16           *Attorneys for Plaintiff*

12           \_\_\_\_\_  
12           */s/ Lew Brandon, Jr.*  
12           Lew Brandon, Jr., Esq.  
13           Nevada Bar No. 5880  
13           Andrew Guzik, Esq.  
14           Nevada Bar No. 12758  
15           139 E. Warm Springs Road  
15           Las Vegas, NV 89119  
16           *Attorneys for Defendant*

18           **ORDER**

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

21           **IT IS SO ORDERED**  
21           DATED: 1:36 pm, September 19, 2022

22             
22           BRENDA WEKSLER  
22           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  
139 E. WARM SPRINGS RD.  
LAS VEGAS, NEVADA 89119  
TEL. 702-380-0007  
FAX. 702-380-2964

---

**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.  
**BRANDON | SMERBER LAW FIRM**  
139 E. Warm Springs Rd.  
Las Vegas, NV 89119  
Tel: 702-380-0007  
Fax: 702-380-2964

The information contained in the electronic message is legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brandon | Smerber Law Firm at (702) 380-0007 and permanently delete the communication immediately without making any copy or distribution.

---

**From:** Sabina Damelas <[Sabina@vegashurt.com](mailto:Sabina@vegashurt.com)>  
**Sent:** Wednesday, September 14, 2022 9:38 AM  
**To:** Maybelline Valle <[M.Valle@bsnv.law](mailto:M.Valle@bsnv.law)>  
**Cc:** Amber King <[amber@vegashurt.com](mailto:amber@vegashurt.com)>  
**Subject:** FW: Elvia Williams v. 99 Cents Only Stores