

1 **SOED**  
 2 **LOREN S. YOUNG, ESQ.**  
 Nevada Bar No. 7567  
 3 **JULIE A. FUNAI, ESQ.**  
 Nevada Bar No. 8725  
 4 **LINCOLN, GUSTAFSON & CERCOS, LLP**  
 ATTORNEYS AT LAW  
 5 7670 W. Lake Mead Blvd., Suite 200  
 Las Vegas, Nevada 89128  
 Telephone: (702) 257-1997  
 6 Facsimile: (702) 257-2203  
[ssplaine@lgclawoffice.com](mailto:ssplaine@lgclawoffice.com)

7 Attorneys for Defendant, TARGET CORPORATION

8  
 9  
 10 UNITED STATES DISTRICT COURT  
 11 CLARK COUNTY, NEVADA

12 CONNIE CRAWFORD-MURRAY,  
 13 Plaintiff,  
 14 v.  
 15 TARGET CORPORATION; DOES I through  
 XX, and ROE BUSINESS ENTITIES I through  
 16 XX, inclusive,  
 17 Defendants.

CASE NO: 2:22-cv-00233-RFB-DJA

**STIPULATION AND ORDER TO  
 EXTEND DISCOVERY DEADLINES  
 (SECOND REQUEST)**

18  
 19 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, CONNIE  
 20 CRAWFORD-MURRAY (“Plaintiff”), by and through their attorney of record, CLIFF MARCEK,  
 21 ESQ. of the law firm BERTOLDO BAKER CARTER SMITH & CULLEN and Defendant, TARGET  
 22 CORPORATION, by and through its attorney of record, JULIE A. FUNAI, ESQ. of the law firm  
 23 LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a ~~one hundred and~~ <sup>sixty (60) day</sup>  
 24 ~~twenty (120) day~~ continuance of the current discovery deadlines.

25 **I. DISCOVERY COMPLETED**

26 1. Plaintiff, CONNIE CRAWFORD-MURRAY served her FRCP 26(a)(1) Initial List of  
 27 Witnesses and Documents on May 9, 2022.

28 ///

- 1           2. Defendant, TARGET CORPORATION served its FRCP 26(A)(1) Initial Disclosure on
- 2           May 11, 2022.
- 3           3. Defendant, TARGET CORPORATION served their Objection to Plaintiffs Initial List of
- 4           Witnesses and Documents on May 19, 2022.
- 5           4. Defendant, TARGET CORPORATION propounded its First Set of Interrogatories and
- 6           Requests for Production of Documents to Plaintiff on June 22, 2022.
- 7           5. Plaintiff served her responses to Defendant TARGET CORPORATION First Set of
- 8           Interrogatories and Requests for Production of Documents on August 19, 2022.
- 9           6. Plaintiff, CONNIE CRAWFORD-MURRAY propounded her First Set of
- 10          Interrogatories, Requests for Production of Documents, and Requests for Admission to
- 11          Defendant TARGET CORPORATION on August 22, 2022.
- 12          7. Plaintiff, CONNIE CRAWFORD-MURRAY served their First Supplement to FRCP
- 13          26(A)(1) Initial List of Witness and Documents on September 30, 2022.
- 14          8. Defendant served its responses to Plaintiff CONNIE CRAWFORD-MURRAY's First
- 15          Set of Interrogatories, Requests for Production of Documents and Requests for
- 16          Admission on October 5, 2022.
- 17          9. Defendant TARGET CORPORATION served its First Supplemental Disclosures
- 18          Pursuant to FRCP 26(a)(1) on April 27, 2023.
- 19          10. Deposition of Plaintiff CONNIE CRAWFORD-MURRAY.

20   **II. DISCOVERY REMAINING TO BE COMPLETED**

21   In addition, Defendant wishes to conduct the remaining discovery:

- 22          1. Depositions of percipient witnesses
- 23          2. Depositions of FRCP 30(b)(6) witnesses
- 24          3. Expert designation and depositions of expert.
- 25          4. Site Inspection.
- 26          5. Additional discovery as needed.

1 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

2 Plaintiff counsel extensive trial schedule, with trial January through March 2023, caused  
3 delayed discovery and deposition scheduling. New counsel, Cliff Marcek recently took over handling  
4 the case for Plaintiff at Bertoldo Carter Smith & Cullen on April 27, 2023. Additionally, the parties  
5 wish to engage in resolution discussions, including, but not limited to, the scheduling of private  
6 mediation. The parties wish to avoid unnecessary costs, fees and expenses in the interest of potential  
7 resolution. The additional time will allow for the parties to schedule private mediation, and if  
8 unsuccessful, conduct the remaining discovery, including depositions.

9 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

10 Plaintiff and Defendant have agreed to extend the current discovery deadline herein for sixty  
11 (60) days to complete the remaining discovery as outlined above. If approved, the new discovery  
12 deadlines would be modified as follows:

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	8/23/2023	10/23/2023
Motions to Amend Pleadings	5/25/2023	7/25/2023
Initial Expert Disclosures	6/26/2023	8/25/2023
Rebuttal Expert Disclosures	7/22/2023	9/25/2023
Dispositive Motions	9/22/2023	11/22/2023
Joint Pre-Trial Order	10/24/2023	12/22/2023

**IT IS SO STIPULATED AND AGREED.**

DATED this 16<sup>th</sup> day of May, 2023.

DATED this 16<sup>th</sup> day of May, 2023.

**LINCOLN, GUSTAFSON & CERCOS, LLP**

**BERTOLDO BAKER CARTER SMITH & CULLEN**

*/s/ Julie A. Funai*

*/s/ Cliff W. Marcek*

**LOREN S. YOUNG, ESQ.**  
Nevada Bar No. 7567  
**JULIE A. FUNAI, ESQ.**  
Nevada Bar No. 8725  
7670 W. Lake Mead Blvd., Suite 200  
Las Vegas, Nevada 89128  
Attorneys for Defendant,  
TARGET CORPORATION

**CLIFF W. MARCEK, ESQ.**  
Nevada Bar No. 5061  
7408 W Sahara Avenue  
Las Vegas, Nevada 89117  
Attorneys of Plaintiff,  
CONNIE CRAWFORD-MURRAY

**ORDER**

IT IS SO ORDERED.



DANIEL J. ALBRERGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: May 18, 2023