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MICHAEL A. VIDAL and
ESTATE OF EVA RAMOS
(through its Administrator
JESSICA CLEMENTE)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL A. VIDAL, et al.,

,

Plaintiffs,

VERIZON PENSION PLAN FOR
ASSOCIATES, et al.,

,

Defendants.

Case No.: 2:22-cv-00274-ART-BNW

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR PARTIES TO COMPLY WITH LR
26-1(a)**

(FIRST REQUEST)

Now come Plaintiffs Michael A. Vidal and Estate of Eva Ramos (through its Administrator Jessica Clemente) (hereinafter collectively “Plaintiffs”), Conduent Incorporated, Conduent Business Services, LLC, Xerox Corporation, and Xerox HR Solutions, LLC (hereinafter collectively the “Conduent Defendants”), and Defendants Verizon Pension Plan for Associates, Verizon Employee Benefits Committee, Kevin Cammarata, Verizon California Inc., Verizon Communications Inc., Verizon Services Corp., and Verizon North. LLC, (hereinafter collectively the “Verizon Defendants”) (the Verizon Defendants together with the Conduent Defendants are collectively

1 referred to as the “Served-Defendants”), and pursuant to Local Rules IA 6-1, 6-2, 7-2, Federal Rule
2 of Civil Procedure Rule 6, and any other applicable rule needed to effectuate this stipulation
3 (hereinafter this stipulation is referred to as the “Discovery-SAO”) hereby stipulate and agree
4 concerning the above captioned case (Case No. 2:20-cv-00924-ART-BNW [hereinafter referred to as
5 the “Case” or “instant matter”]) as follows:

7 WHEREAS, Plaintiffs filed an initial complaint (ECF No. 1) on February 14, 2022;

8 WHEREAS, Plaintiffs last amended their complaint (ECF No. 10; hereinafter referred to as
9 “SAC”) on March 8, 2022;

10 WHEREAS, the Conduent Defendants and the Verizon Defendants filed motions to dismiss
11 the SAC on June 17, 2022 (ECF Nos. 42 and 44 [hereinafter referred to as “MTDs”]);

12 WHEREAS, pursuant to LR 26-1 and Fed. R. Civ. P 26 *all* parties that have appeared in the
13 Case—including Conduent Defendants, Verizon Defendants and the Plaintiffs (hereinafter the
14 Conduent Defendants, Verizon Defendants and Plaintiffs are collectively referred to as the
15 “Stipulating Parties”)---held a Rule 26(f) conference (“26f Conference”) on July 14, 2022 and July
16 20, 2022;

18 WHEREAS, pursuant to LR 26-1, Fed. R. Civ. P. 26 and the Court’s previous order a
19 proposed “stipulated discovery plan and scheduling order” is currently due on August 1, 2022;

21 WHEREAS, there over a dozen Stipulating Parties and the aforesaid Stipulating Parties
22 require more time for the completion of (and to comply with) LR 26-1(a)’s requirements;

23 WHEREAS, because of other litigation commitments (including but not limited to the
24 overlapping time needed to prepare and draft pleadings in this Case concerning the MTDs, inclusive
25 of the Plaintiffs drafting-and-preparing oppositions to the MTDs, and the Served-Defendants
26 drafting-and-preparing replies in support concerning their MTDs) of lead counsel for all of the
27 Stipulating Parties, as well as a pre-existing prepaid and pre-scheduled family trip of lead counsel for
28

1 the Conduent Defendants the week of July 24, 2022, the Stipulating Parties have agreed to request
2 that the deadline for complying with LR 26-1(a) (which Rule includes a time for proposed
3 “discovery plan and scheduling order” and initial disclosures) be enlarged and extended such that the
4 time for filing and submitting a proposed “stipulated discovery plan and scheduling order” be
5 enlarged and extended from August 1, 2022 to August 26, 2022 to submit initial disclosures be
6 modified and extended to September 30, 2022 for all the Stipulating Parties;

8 WHEREAS this Discovery-SAO is made in good faith with good cause and not for the
9 purpose of delay;

10 WHEREAS, no prior extensions of the deadline to comply with LR 26-1(a) have been
11 requested;

12 WHEREAS, Fed. R. Civ. P. 6(b) requires the Court to approve the requested extension of
13 time and therefore the Conduent Defendants, the Verizon Defendants and Plaintiffs collectively
14 request that the Court approve the stipulation, and HEREBY STIPULATE AND AGREE (and
15 respectfully request that the Court GRANT and ORDER the relief requested hereunder) as set forth
16 hereunder:

18 a. This is the Stipulating-Parties’ first stipulation for an enlargement of time to comply with
19 LR 26-1(a);
20 b. That Stipulating Parties’ time to comply with LR 26-1(a) be enlarged as follows: (i) the
21 time for the parties to file their proposed stipulated discovery plan and scheduling order be
22 extended until August 26, 2022 (if Stipulating Parties can not agree to a proposed stipulated
23 discovery plan and scheduling order on that date then they should submit competing
24 discovery plan and scheduling orders on that date);³ and (ii) the time for the Stipulating
25 Parties to serve their initial Rule 26(a)(1) disclosures be extended to September 30, 2022
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1 c. This stipulation is made in good faith and not made for purposes of delay.

IT IS SO STIPULATED.

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Conduent Incorporated, Conduent Business Services, LLC, Xerox Corporation, and Xerox HR Solutions, LLC

ORDER

IT IS SO ORDERED

DATED: 10:41 am, August 01, 2022

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE