

1 AARON D. FORD
 Attorney General
 2 VICTORIA C. COREY (Bar No. 16364)
 Deputy Attorney General
 3 State of Nevada
 Office of the Attorney General
 4 1 State of Nevada Way, Ste. 100
 Las Vegas, Nevada 89119
 5 (702) 486-9245 (phone)
 (702) 486-3768 (fax)
 6 Email: vcorey@ag.nv.gov

7 *Attorneys for Defendants*
Alfonso Alvarez, Paul Araujo, Jason Arrey,
 8 *Jay Barth, Gregory Bryan, Jaymie Cabrera,*
Marie Cervas, Dante Famy, Javier Garcia,
 9 *Robin Hennequin, William Kululoia, Dontril Livingston,*
Malynda Lowery, Danyele Madsen, Rio Manalang,
 10 *Francis Moka, Jennifer Nash, Ronald Oliver,*
Dean Ontiveros, Nicholas Parson, Georges Pele-Taino,
 11 *Tawyna Perry, Kristi Roberson, Renan Saintpreux,*
James Scally, Ernesto Torres, Marc Trotter,
 12 *Michael Val, Rodolfo Valle, and Julie Williams*

13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 MARK PICOZZI,

17 Plaintiff,

18 v.

19 STATE OF NEVADA, *et al.*,

20 Defendants.

Case No. 2:22-cv-01011-ART-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND THE TIME FOR
 DISCOVERY AND DISPOSITIVE
 MOTIONS
 [FIRST REQUEST]**

21
 22 Plaintiff Mark Picozzi, and Defendants, by and through counsel, Aaron D. Ford, Nevada Attorney
 23 General, and Victoria C. Corey, Deputy Attorney General, of the State of Nevada, Office of the Attorney
 24 General, hereby stipulate and agree to extend the time for discovery and dispositive motions. There is
 25 good cause for this Court to grant an extension in this case. LR 26-3. This is the parties' first stipulated
 26 request to extend deadlines.

27 ///

28 ///

1 requests to Defendant Jacques Graham. The parties continue to have great communication, and agree that
2 an extension of one-hundred and eighty (180) days is necessary to finish discovery in this matter.

3 **III. ~~PROPOSED~~ SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY AND**
4 **FILING OF DISPOSITIVE MOTIONS**

5 The Parties propose the following schedule for completion of all remaining discovery and the
6 filing of any dispositive motions:

- 7 • The deadline for completion of discovery will be extended to **April 14, 2025**.
- 8 • The deadline for amendment of pleadings will be extended to **January 13, 2025**.
- 9 • The deadline for expert disclosures will be extended to **February 11, 2025**, and the
10 disclosures of rebuttal experts will be extended to **March 16, 2025**.
- 11 • The deadline to file any dispositive motions will be extended to **May 19, 2025**.
- 12 • The deadline to file a Joint Pre-Trial order will be extended until **June 16, 2025**, or, if
13 dispositive motions are filed, until thirty (30) days after the entry of any order on the
14 dispositive motions.

15 **IV. CONCLUSION**

16 Based on the foregoing, good cause exists, and the parties respectfully request that this Court
17 extend the deadlines as outlined above.

18
19 DATED this 26th day of August, 2024.

DATED this 27th day of August, 2024.

20 AARON D. FORD
21 Attorney General

22 /s/ Victoria C. Corey
23 VICTORIA C. COREY (Bar No. 16364)
24 Deputy Attorney General

25 *Attorneys for Defendants*



26 MARK PICOZZI #1163673

27 *Plaintiff, Pro Se*

28 **ORDER**

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Date: August 29, 2024