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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ELLEN REEVES, individually,
 11 Plaintiff,

12 vs.

13 DISCOVER YOUR MOBILITY, INC., a
 14 foreign corporation; SOLO WORLD
 PARTNERS, LLC, a foreign limited liability
 15 company; DOE EMPLOYEES I-V,
 16 individually; DOE MANAGERS I-V,
 17 individually; ROE MANUFACTURERS I-X;
 ROE INSPECTION COMPANIES I-V; ROE
 18 DISTRIBUTORS I-X; DOE INDIVIDUALS
 I-X; and ROE BUSINESS ENTITIES I-X,
 inclusive,

19 Defendants.

CASE NO: 2:22-cv-01361-GMN-DJA

**RENEWED DISCOVERY PLAN AND
 [PROPOSED] SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
 REQUESTED**

20 Plaintiff ELLEN REEVES, by and through her counsel of record ADAM ELLIS, ESQ.;
 21 Discovery Your Mobility, Inc., by and through its counsel of record ADAM KNECHT, ESQ., and
 22 SOLO WORLD PARTNERS, LLC, by and through its counsel of record JOHN KRIEGER,
 23 ESQ.. hereby submit their Renewed Discovery Plan and Scheduling Order pursuant to Fed R.
 24 Civ. P. 26(f) and Local Rule 26-1, as Defendant Solo World Partners, LLC recently appeared in
 25 the case.

26 **I. REASON FOR SPECIAL SCHEDULING REVIEW**

27 This case is relatively unusual, as Defendant Solo World Partners appeared in the case the
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1 day before discovery was to be completed. Plaintiff added Defendant Solo World via Motion, and
2 the discovery period waned while Plaintiff effectuated service of process and while Defendant
3 Solo World filed a responsive pleading. Thus, the parties seek discovery to be reopened.

4 **II. ESTIMATED TIME REQUIRED FOR DISCOVERY:**

5 The parties believe one-hundred twenty days from the date of submission is sufficient to
6 complete any remaining discovery, namely by and regarding Defendant Solo World Partners,
7 LLC, as it appeared in the case on March 21, 2024. **The Discovery Cutoff will be September 17,**
8 **2024**

8 **III. AMENDING THE PLEADINGS AND ADDING PARTIES:**

9 This deadline has passed, and the parties do not believe it is necessary to extend this deadline.

10 **IV. FED. R. CIV. P. 26(A)(2) EXPERT DISCLOSURES:**

11 In accordance with Fed. R. Civ. P. 26(a)(2), disclosures identifying experts shall be made 60
12 days prior to the discovery cutoff date. The deadline will be **July 19, 2024** for Defendant Solo
13 World, as the deadline to disclose experts for Plaintiff and Defendant Discover Your Mobility,
14 Inc. has already passed.

15 The parties believe the deadline for Rebuttal Expert Disclosures should be thirty (30) days
16 after the deadline for initial disclosures, making the deadline **August 19, 2024**.

17 **V. DISPOSITIVE MOTIONS:**

18 The parties shall file dispositive motions 30 days after the discovery cutoff date, and
19 therefore, not later than **October 17, 2024**.

20 **VI. PRETRIAL ORDER:**

21 If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint
22 Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore,
23 not later than **November 18, 2024**.

24 In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be
25 suspended until 30 days after the Court enters a ruling on dispositive motions, or otherwise by
26 further Court order. The disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections
27 thereto, shall be included in the Joint Pretrial Order.

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1 **VII. ALTERNATIVE DISPUTE RESOLUTION:**

2 The parties certify that they met and conferred about the possibility of using alternative
3 dispute resolution processes including mediation or arbitration. While the parties are open to
4 various means of resolution, they agree additional discovery must be obtained prior to scheduling
5 any kind of settlement conference. However, the parties will continue the informal settlement
6 discussions underway.

7 **VIII. ALTERNATIVE FORMS OF CASE DISPOSITION:**

8 The parties hereby certify that they considered consent to trial by a magistrate judge under 28
9 U.S.C. § 636(c) and Fed. R. Civ. P. 73, use of the Short Trial Program (General Order 2013-01).
10 The parties have not agreed to trial by a magistrate judge or the use of the short trial program, at
11 this time.

12 **IX. ELECTRONIC EVIDENCE:**

13 The parties did not come to any stipulations regarding providing discovery in an electronic
14 format, and will evaluate the need for special procedures for electronic evidence should the need
15 arise.

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17 */s/ Adam Ellis*
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26 *Attorneys for Def. Solo World Partners, LLC*

1 IT IS THEREFORE ORDERED that the parties' stipulated discovery plan (ECF No. 38) is
2 GRANTED



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4 DANIEL J. ALBREGTS
5 UNITED STATES MAGISTRATE JUDGE

6 DATED: 6/3/2024
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