

LEE, LANDRUM & INGLE 7575 VEGAS DRIVE, SUITE 150 LAS VEGAS, NV 89128 702) 880-9750

> 23 McNulty Mickus that the deadlines for Defendants' Initial Expert Disclosure and Rebuttal Expert 24 Disclosures be extended one week from their current due dates.

> 25 The parties have been working diligently to complete discovery in this case. The parties 26 are currently in the process of disclosing expert witnesses. Plaintiff served his initial expert 27 disclosure on July 29, 2024. The Defendants' initial expert disclosures were due to be served on 28 August 26, 2024. Rebuttal Expert disclosures are due on September 24, 2024.

Defendant Wolff Principal Holdings LP d/b/a Fremont & 9th Apartments ("Wolff") is 1 seeking a one-week extension to serve its initial expert disclosure, seeking a new disclosure date of 2 September 3, 2024. Defendant Schindler Elevator Corporation ("Schindler") agrees to Defendant 3 Wolff's request for a one-week extension, if the same extension is provided to Schindler. Plaintiff 4 has agreed to the one-week extension of time for both Defendants to serve their initial expert 5 disclosures, in exchange for a one-week extension of time to serve Rebuttal Expert Disclosures. 6 The new, agreed upon due date for Rebuttal Expert Disclosures will be October 1, 2024. 7 Defendants Wolff and Schindler agree to the extension of time for Rebuttal Expert Disclosures and 8 the new disclosure date. 9

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## I. <u>PROPOSED REVISED DISCLOSURE DATES</u>

The parties hereby stipulate to extend the following two (2) disclosure deadlines and propose the following amendments to the current discovery deadlines:

	Old Deadline	New Deadline
Defendant's initial expert disclosures:	August 26, 2024	September 3, 2024
Rebuttal expert disclosures:	September 24, 2024	October 1, 2024
No trial date has been set.		

## SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

Dated: August 26, 2024.

## **EVANS FEARS SCHUTTERT MCNULTY MICKUS**

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23 Jay J. Schuttert, Esq. (SBN 8656)
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 27 Schindler Elevator Corporation

## **RICHARD HARRIS LAW FIRM**

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4	Las Vegas, NV 89128 Attorneys for Defendant Wolff Principal		
5	Holdings, LP dba Fremont & 9 <sup>th</sup> Apartments		
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7	ORDER		
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9	IT IS SO ORDERED. Based upon the foregoing stipulation, the request to extend the		
10	following two (2) disclosure deadlines is granted as follows:		
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12	Old Deadline New Deadline		
13	Defendant's initial expert disclosures: August 26, 2024 September 3, 2024		
14	Rebuttal expert disclosures: September 24, 2024 October 1, 2024		
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18	Hon. Maximiliano D. Couvillier III UNITED STATES MAGISTRATE JUDGE		
19	DATED:8/27/24 Case No. 2:22-cv-01806-MMD-MDC		
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21	Respectfully submitted by:		
22			
23	LEE, LANDRUM & INGLE		
24	David S. Lee David S. Lee, Esq. (SBN 6033)		
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