

1 JASON M. FRIERSON  
2 United States Attorney  
3 District of Nevada  
4 Nevada Bar No. 7709  
5 STEPHEN R. HANSON II  
6 Assistant United States Attorney  
7 501 Las Vegas Blvd. So., Suite 1100  
8 Las Vegas, Nevada 89101  
9 (702) 388-6336  
10 Stephen.Hanson@usdoj.gov

11 *Attorneys for the United States*

12

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

14 Hernando Alberto Heredia,

15 Case No. 2:22-cv-01846-RFB-DJA

16 Plaintiff,

17 **Stipulation to Extend Discovery Plan**  
18 **and Scheduling Order**

19 v.

20 **(Second Request)**

21 United States of America *ex rel.* United  
22 States Postal Service,

23 Defendants.

24 The parties stipulate to extend the remaining deadlines in the Stipulated Discovery  
25 Plan and Scheduling Order by 60 days. This is the second request to extend the Stipulated  
26 Discovery Plan and Scheduling Order. This extension is requested because the United  
27 States recently received all subpoenaed records and needs additional time to provide  
28 supplemental disclosures and expert reports to Plaintiff.

29 **I. Discovery Completed**

30 The parties have exchanged written discovery in the form of interrogatories and  
31 requests for production of documents. The parties have taken depositions of the Plaintiff  
32 and the government driver. The United States has subpoenaed 16 medical providers. The  
33 United States has received records and imaging from all providers. The United States has  
34 made a supplemental disclosure of subpoenaed records it received. Plaintiff has served an  
35 expert disclosure.

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1 **II. Discovery Remaining**

2 The United States need to exchange expert reports. The United States needs to  
3 provide an additional supplemental disclosure of the documents it has received through  
4 subpoenas.

5 **III. Why Discovery Has Not Been Completed**

6 One of the providers that had not produced documents was discovered later in  
7 discovery, and United States was following up with the provider for those records and  
8 ultimately received them. In addition, the United States needed to follow up with some of  
9 the providers for medical imaging that its expert requested, and the United States recently  
10 received all of the imaging that it requested. With the impending holidays and potential  
11 work-related travel for the United States' counsel the week that expert disclosures are due,  
12 the United States needs additional time to consult with its expert about the imaging and  
13 produce a supplemental disclosure and expert reports.

14 **IV. Proposed Deadlines**

15 Close of Discovery: March 30, 2024 (from January 30, 2024)

16 Initial Expert Disclosures: January 30, 2024 (from December 1, 2023)

17 Rebuttal Expert Disclosures: March 2, 2024 (from January 2, 2024)

18 Dispositive Motions: May 1, 2024 (from March 2, 2024)

19 Joint Pre-Trial Order: May 31, 2024 (from April 1, 2024)

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1 Respectfully submitted this 9th day of November 2023.  
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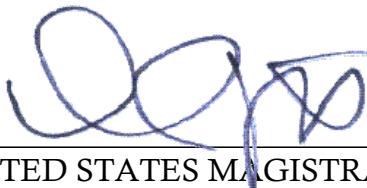
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5 JASON M. FRIERSON  
6 United States Attorney

HICKS & BRASIER, PLLC

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10 /s/ Stephen R. Hanson II  
11 STEPHEN R. HANSON II  
12 Assistant United States Attorney

/s/ Betsy C. Jefferis-Aguilar  
13 BETSY C. JEFFERIS-AGUILAR  
14 Attorney for Plaintiff

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