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7 UNITED STATES DISTRICT COURT
 8 DISTRICT OF NEVADA

9 * * *

10 **Courtney Cloud,**

Case No.: 2:23-cv-00468-JCM-DJA

11 Plaintiff,

12 vs.

13
 14 **Allstate Indemnity Company;** Does 1
 15 through 10, inclusive, and Roe
 16 Corporations 1 through 10, inclusive,

**Stipulation and [Proposed] Order to
 Extend Deadlines
 (5th Request)**

17 Defendants.

18 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,
 19 by and through their respective counsel of record, that the discovery deadlines in
 20 this case be extended as follows:

21
22 **A. COMPLETED DISCOVERY**

- 23 1. Plaintiff has served her initial disclosures of witnesses and documents, and
 24 supplements thereto;
 25 2. Defendant has served its initial disclosures of witnesses and documents, and
 26 supplements thereto;
 27 3. Plaintiff has propounded and answered written discovery requests;
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- 1 4. Defendant has propounded and answered written discovery requests;
- 2 5. Plaintiff and Defendant have disclosed their initial and rebuttal expert
- 3 witnesses and supplements thereto;
- 4 6. Plaintiff has taken the depositions of Allstate employees Sean Owens,
- 5 Christine Fox, Jonathan Bourne, Rodney Farney and Steven Peterson;
- 6 7. Defendant has taken the deposition of Plaintiff;
- 7 8. Defendant has taken the deposition of Plaintiff's experts Paul Thomas and
- 8 Stephen Strzelec.

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10 **B. OUTSTANDING DISCOVERY**

- 11 1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;
- 12 2. Deposition of Defendant's expert witness Steven Plitt.

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14 **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

15 Counsel for the parties have been diligent in conducting discovery but need
16 additional time to conduct the remaining two depositions. The deposition of Allstate
17 Indemnity Company's FRCP 30(b)(6) witness was noticed for August 1, 2024, but
18 there was a scheduling conflict, and it was rescheduled for September 26, 2024, close
19 to the close of discovery. The parties also agreed to reschedule the deposition of
20 Defendant's expert Steven Plitt, due to scheduling conflicts earlier this month. The
21 next available date for Defendant's expert is October 29, 2024, which is after the
22 close of discovery. Therefore, there is good cause to extend the discovery deadlines
23 as requested.

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25 **D. PROPOSED EXTENDED DEADLINES**

26 The parties have agreed to extend the discovery deadlines in this case, as follows:
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	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	Closed	Closed
Close of Discovery	October 7, 2024	November 6, 2024
Dispositive motions	November 5, 2024	December 6, 2024
Pretrial Order	December 6, 2024	January 6, 2025 or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 29th day of August, 2024.

Dated this 29th day of August, 2024.

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KEATING LAW GROUP

/s/ Marjorie Hauf

/s/ John T. Keating

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IT IS SO ORDERED.

ORDER

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: 8/30/2024