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 Attorneys for Defendant TRUMP RUFFIN
 8 TOWER I, LLC, erroneously sued herein as
 TRUMP RUFFIN COMMERCIAL, LLC, d/b/a
 9 TRUMP INTERNATIONAL LAS VEGAS and
 TRUMP INTERNATIONAL HOTEL &
 10 TOWER LAS VEGAS; and TRUMP
 INTERNATIONAL HOTELS MANAGEMENT,
 11 LLC

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA, SOUTHERN DIVISION

15 SEBASTIAN SYMEONIDES, an
 Individual,

16 Plaintiff,

17 vs.

18 TRUMP RUFFIN COMMERCIAL, LLC, a
 19 Foreign Limited-Liability Company d/b/a
 TRUMP INTERNATIONAL LAS VEGAS
 20 and TRUMP INTERNATIONAL HOTEL &
 TOWER LAS VEGAS; TRUMP RUFFIN
 21 TOWER I, LLC, a Foreign Limited-Liability
 Company; TRUMP INTERNATIONAL
 22 HOTELS MANAGEMENT, LLC, a Foreign
 Limited-Liability Company; OTIS
 23 ELEVATOR CORPORATION, a Foreign
 Corporation; DOES I through X, inclusive;
 24 and ROE BUSINESS ENTITIES I through
 XX, inclusive,

25 Defendants.
 26

Case No. 2:23-cv-00854-JAD-MDC
**STIPULATION TO EXCEED THE 10
 DEPOSITION LIMIT PURSUANT TO
 RULE 30(a)(2)(A)**

27 COMES NOW, Plaintiff SEBASTIAN SYMEONIDES, by and through his attorneys
 28

1 of record, the law firm CHRISTIANSEN TRIAL LAWYERS, Defendant TRUMP RUFFIN
2 TOWER I, LLC, erroneously sued herein as TRUMP RUFFIN COMMERCIAL, LLC, d/b/a
3 TRUMP INTERNATIONAL LAS VEGAS and TRUMP INTERNATIONAL HOTEL &
4 TOWER LAS VEGAS; and TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC by
5 and through its counsel of record, the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP
6 and Defendant OTIS ELEVATOR COMPANY by and through its counsel of record, the law
7 firm ROGERS, MASTRANGELO, CARVALHO, AND MITCHELL and TUCKER ELLIS LLP,
8 and hereby agree that the limit of ten (10) depositions per side, set forth by Fed. R. Civ. P.
9 30(a)(2)(A), will be exceeded by Defendants and by Plaintiffs as stipulated herein.

10 This matter involves allegations of personal injury by Plaintiff SEBASTIAN
11 SYMEONIDES as a result of an alleged elevator incident on February 14, 2022. Due to
12 the degree of alleged damages, as well as the complexity of the damages and the alleged
13 incident, the parties agree that the ten (10) deposition limit per side will prevent the parties
14 from adequately preparing their cases for trial in this matter. This matter involves numerous
15 fact witnesses, including numerous medical and expert witnesses, which will need to be
16 deposed to adequately resolve this matter on the merits.

17 Therefore, the parties hereby stipulate to exceed ten (10) depositions per Fed. R.
18 Civ. P 30(a)(2)(A), subject to the following:

- 19 1. Nothing in the parties' stipulation or any associated Order shall be construed so
20 as to modify the Fed. R. Civ. P. 30(d)(1) limitations as to deposition duration
21 ("[u]nless otherwise stipulated or ordered by the court, a deposition is limited to
22 1 day of 7 hours"); nor shall this stipulation be construed so as to deprive any
23 party of that party's right to seek Court relief from the Rule 30(d) deposition
24 duration limitations pursuant to that subsection.
- 25 2. Nothing in the parties' stipulation or any associated Order shall be construed so
26 as to prejudice or preclude the right of any parties hereto from seeking Court
27 relief, including but not limited to any protective orders, pursuant to any
28 applicable provisions of the Federal Rules of Civil Procedure - including but not

1 limited to Fed. R. Civ. P. 26(c), 30(d), 30(g).

2 Dated this 7th day of May, 2024

Dated this 7th day of May, 2024

3 CHRISTIANSEN TRIAL LAWYERS

LEWIS BRISBOIS BISGAARD &
SMITH LLP

4
5 /s/ R. Todd Terry

/s/ Josh Cole Aicklen

6 PETER CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
7 R. TODD TERRY, ESQ.
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Trump Ruffin Tower I, Trump International
Las Vegas and Trump International Hotel
& Tower Las Vegas and Trump
International Hotels Management, LLC

11 Dated this 7th day of May, 2024

12 ROGERS, MASTRANGELO, CARVALHO
13 & MITCHELL

14
15 /s/ Rebecca L. Mastrangelo

16 REBECCA L. MASTRANGELO, ESQ.
Nevada Bar No. 5417
17 700 South 3rd Street
Las Vegas, NV 89101
18 *Attorneys for Defendant Otis Elevator*
Company

19 Dated this ___ day of May, 2024

20 TUCKER ELLIS LLP

21 /s/ Vasudhsiri T. Sathienmars

22 SU-LYN COMBS, ESQ. (*Pro Hac Vice*)
23 515 South Flower Street
Forty-Second Floor
24 Los Angeles, CA 90071

IT IS SO ORDERED


/s/
United States Magistrate Judge

25 V. SATHIENMARS (*Pro Hac Vice*)
26 201 Mission Street, Suite 2310
San Francisco, CA 94105

27 *Attorneys for Defendant Otis Elevator*
28 *Company*

DATED: 5-9-24