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6 Attorneys for Defendant
COSTCO WHOLESALE CORPORATION

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MEIZHEN WANG, individually,

Case No. 2:23-cv-01097-JAD-BNW

10 Plaintiff,

11 v.

12 COSTCO WHOLESALE CORPORATION,
13 a Washington Corporation; DOE
EQUIPMENT OPERATOR; DOES 2-20
14 and ROE BUSINESS ENTITIES 1-20
inclusive,

15 Defendants.

16 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES – EXPERT**
17 **DEADLINES ONLY (SECOND REQUEST)**

18 Defendants, Costco Wholesale Corporation (Defendant), by and through their attorneys
19 of record, GEORGE M. RANALLI, ESQ. and MAEGUN C. MOOSO, ESQ. of the law firm
20 RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff, Meizhen Wang (Plaintiff), by
21 and through her attorneys of record CLARK SEEGMILLER, ESQ., of the RICHARD HARRIS
22 LAW FIRM to hereby request this Honorable Court to extend the expert deadlines only as
23 requested herein.
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I. LOCAL RULE 6-1 IS SATISFIED

This is the second request for an extension of discovery deadlines filed by the parties. However, this request is only for an extension of experts. This Stipulation and request for extension of discovery dates is made more than twenty-one (21) days before the expiration of the deadline for discovery in this case, which is currently September 30, 2024, with initial experts due July 1, 2024.

Pursuant to the controlling Discovery Plan, the following dates govern for purposes of discovery:

- 1. Discovery Cutoff Date: September 30, 2024
- 2. Initial Expert Disclosure: July 1, 2024
- 3. Rebuttal Expert Disclosure: August 2, 2024
- 4. Dispositive Motions: October 29, 2024
- 5. Joint Pre-Trial Order: November 29, 2024

This requested extension will not change any deadline other than the current expert deadline and the current rebuttal deadline.

The parties have already begun the discovery process including taking relevant depositions, obtaining medical records and bills and conducting discovery amongst the relevant parties. The parties believe that adjusting the expert disclosure deadline by agreement will increase efficiencies in the case and possibly obviating the need for the retention of certain experts. If so, this will decrease the cost of the litigation.

According the parties are requesting to extend the expert deadline to September 2, 2024 and the rebuttal deadline to September 30, 2024.

Based on the foregoing, the parties have agreed to the extension.

The instant request comports with Local Rule 6-1, in that no request is made after the expiration of the specified period.

II. THE FOLLOWING DISCOVERY HAS BEEN COMPLETED

- 1. Plaintiff's Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
- 2. Plaintiff's First Supplement to Initial List of Witnesses and Documents Pursuant to FRCP 26(a);

- 1 3. Plaintiff's Second Supplement to Initial List of Witnesses and Documents Pursuant to
- 2 FRCP 26(a);
- 3 4. Plaintiff's Third Supplement to Initial List of Witnesses and Documents Pursuant to
- 4 FRCP 26(a);
- 5 5. Plaintiff's Fourth Supplement to Initial List of Witnesses and Documents Pursuant to
- 6 FRCP 26(a);
- 7 6. Plaintiff's Fifth Supplement to Initial List of Witnesses and Documents Pursuant to
- 8 FRCP 26(a);
- 9 7. Plaintiff's Sixth Supplement to Initial List of Witnesses and Documents Pursuant to
- 10 FRCP 26(a);
- 11 8. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
- 12 9. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 13 26(f);
- 14 10. Defendant's Second Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 15 FRCP 26(f);
- 16 11. Defendant's Third Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 17 FRCP 26(f);
- 18 12. Defendant's Fourth Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 19 FRCP 26(f);
- 20 13. Defendant's Fifth Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 21 26(f);
- 22 14. Defendant's First Set of Interrogatories to Plaintiff;
- 23 15. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of
- 24 Interrogatories;
16. Defendant's Second Set of Interrogatories to Plaintiff;
17. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of
- Interrogatories;
18. Defendant's First Set of Request for Production of Documents to Plaintiff;

- 1 19. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of
- 2 Requests for Production of Documents;
- 3 20. Defendant's Second Set of Request for Production of Documents to Plaintiff;
- 4 21. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of
- 5 Requests For Production of Documents;
- 6 22. Defendant's First Set of Requests for Admissions to Plaintiff;
- 7 23. Plaintiff's Responses to Defendant Costco Whole Corporation's First Set of Requests for
- 8 Admissions;
- 9 24. Defendant's Second Set of Requests for Admissions to Plaintiff;
- 10 25. Plaintiff's Responses to Defendant Costco Whole Corporation's Second Set of Requests
- 11 for Admissions;
- 12 26. Plaintiff's First Set of Interrogatories to Defendant;
- 13 27. Defendant Costco Wholesale Corporation's Responses to Plaintiff's First Set of
- 14 Interrogatories;
- 15 28. Deposition of Fendy Anna Wang;
- 16 29. Deposition of Leonardo A. Lopez;
- 17 30. Deposition of Meizhen Wang;

18 Under Local Rule 26-3(d), it is necessary to articulate a proposed schedule for
19 completing all remaining discovery. The parties are requesting only the expert and rebuttal
20 deadline be extended.

21 The following deadlines are requested.

- | | |
|---|--------------------|
| 22 1. Discovery Cutoff Date: | September 30, 2024 |
| 23 2. Amending the Pleadings/Adding Parties | July 1, 2024 |
| 24 3. Initial Expert Disclosure: | September 2, 2024 |
| 4. Rebuttal Expert Disclosure: | September 30, 2024 |
| 5. Dispositive Motions: | October 29, 2024 |
| 6. Joint Pre-Trial Order: | November 29, 2024 |

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The parties hereby stipulate to the proposed changes in the discovery deadlines.

IT IS SO STIPULATED.

May 31, 2024

May 31, 2024

**RANALLI ZANIEL FOWLER & MORAN,
LLC**

RICHARD HARRIS LAW FIRM

/s/ George M. Ranalli

/s/ Clark Seegmiller

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Attorneys for Plaintiff

Henderson, Nevada 89052

Attorney for Defendant

ORDER

IT IS HEREBY ORDERED.

DATED: 6/3/2024


JUDGE BRENDA WEKSLER

From: [Mysty D. Langford](#)
To: [George Ranalli](#); [Clark Seegmiller](#)
Cc: [Maegun Mooso](#); [Ashley Strange](#)
Subject: Re: Wang v. Costco
Date: Friday, May 31, 2024 3:20:07 AM
Attachments: [image001.png](#)

Clark indicates you may affix his e-signature.

Mysty D. Langford
Law Clerk

Direct Dial - 702-444-4367

Richard Harris Law Firm



| | |
|--------------------------|-------------------------------|
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From: George Ranalli <gmrnalli@ranallilawyers.com>
Sent: Thursday, May 30, 2024 1:45 PM
To: Mysty D. Langford <mlangford@richardharrislaw.com>; Clark Seegmiller <clark@richardharrislaw.com>
Cc: Maegun Mooso <mmooso@ranallilawyers.com>; Ashley Strange <astrange@ranallilawyers.com>
Subject: Wang v. Costco

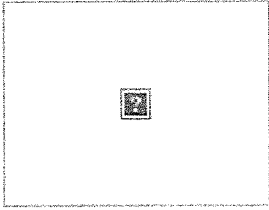
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Hi Clark and Mysty: here is the stip.. Can we use your electronic sig? we just adjusted the expert and rebuttal (per my conversation with Clark). Would like to get this to Court today..Thanks.

Ashley, please follow up with Mysty asap..Thanks.

George M. Ranalli, Partner
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