

RUIZ LAW FIRM

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Attorney for Plaintiff

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 JAMIE HATCH,
10
11 Plaintiff,

Case No.: 2:23-cv-01705-JAD-BNW

12 vs.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(1st Request)**

13 COUNTRY PREFERRED INSURANCE
14 COMPANY, a Georgia Foreign Insurance
Company; DOES 1-10; and ROE Entities 11
15 through 20, inclusive jointly and severally,
16
17 Defendants.

18 COUNTRY PREFERRED INSURANCE
19 COMPANY, an Illinois Corporation,
20
21 Counterclaimant,

22 vs.

23 JAMIE HATCH,
24
25 Counter- Defendant.

26 In accordance with Local Rules of Practice for the United States District Court for the
27 District of Nevada ("LR") 26-4, Plaintiff Jamie Hatch ("Plaintiff"), by and through his counsel of
28 record, LAWRENCE RUIZ, ESQ. of the RUIZ LAW FIRM, and Defendant Country Preferred
Insurance Company ("Defendant"), by and through their counsel of record, GINA M.

1 MUSHMECHE, ESQ. of KRAVITZ, SCHNITZER, JOHNSON & WATSON, CHTD., hereby
2 stipulate and agree to an extension of all remaining discovery deadlines by sixty (60) days. The
3 parties propose the following revised discovery plan (new information in bold italics):

4 Pursuant to Local Rule 6-1(b), the Parties hereby aver that this is the first such discovery
5 extension requested in this matter. Further: 1) there is no danger of prejudice as the extension is
6 stipulated by the Parties; 2) a sixty (60) day extension will not impact a trial date because the
7 same has not been scheduled; and 3) the requested extension is made in good faith by both
8 Parties. *Pioneer Investment Services v. Brunswick Associate 's, Ltd.*, 507 U.S. 380, 395 (1993).
9
10

11 **I.**
DISCOVERY COMPLETED TO DATE

- 12 1. Plaintiff served his Initial Disclosure Pursuant to FRCP 26 on December 20,
13 2023;
14
15 2. Defendant served its Initial Disclosure Pursuant to FRCP 26 on December 26,
16 2023;

17 **II.**
DISCOVERY TO BE COMPLETED AND REASONS
FOR EXTENSION OF DISCOVERY

18 Discovery to be completed includes:
19

- 20
21 1. Deposition of Plaintiff.
22 2. Deposition of Defendant's FRCP 30(b)(6) representative(s).
23 3. Deposition of Plaintiff's Expert.
24 4. Deposition of Defendant's Expert.
25 5. Depositions of fact witnesses.
26 6. Depositions of Plaintiff's treating medical providers.
27 7. Depositions of Defendant's employees.
28

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V.
[PROPOSED] NEW DISCOVERY DEADLINES

Discovery cutoff: *June 3, 2024*
Amending the pleadings or adding parties: *Closed*
Expert Disclosures: *April 5, 2024*
Rebuttal Disclosures: *May 3, 2024*
Dispositive motions: *July 2, 2024*
Joint Pre-Trial Order, if no Dispositive Motions *August 2, 2024*

The Parties aver that this request for extension of discovery deadlines is made by the Parties in good faith and not for the purpose of delay.

APPROVED AS TO FORM AND CONTENT.

RUIZ LAW FIRM

KRAVITZ, SCHNITZER, JOHNSON & WATSON, CHTD.

/s/ Lawrence Ruiz

/s/ Gina M. Mushmeche

LAWRENCE RUIZ, ESQ.
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1055 Whitney Ranch Drive, Suite 110
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Attorney for Plaintiff/Counter-Defendant

GINA M. MUSHMECHE, ESQ.
Nevada Bar No. 10411
8985 S. Eastern Avenue, Suite 200
Las Vegas, NV 89123
Attorney for Defendant/Counterclaimant

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 2/5/2024

Re: Hatch v. Country

Gina Mushmeche <gmushmeche@ksjattorneys.com>

Fri 2/2/2024 2:08 PM

To: Tammy Wagner <Tammy@lmruizlaw.com>

Cc: Lawrence Ruiz <lawrence@lmruizlaw.com>; Courtney Cruse <CCruse@ksjattorneys.com>

Confirmed. Permission to sign.

Sent from my iPhone

On Feb 2, 2024, at 2:07 PM, Tammy Wagner <Tammy@lmruizlaw.com> wrote:

Sorry, can I confirm that I have your permission to use your e-signature?

Thank you,

Tammy A. Wagner, ACP

Advanced Certified Paralegal/Office Administrator

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