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 13 *Amentum Services, Inc*

14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 JONATHON HILL, an individual, and
 17 PHILLIP ROWTON, an individual,
 18 Plaintiffs,
 19 vs.
 20 AMENTUM SERVICES, INC., and Does 1-10,
 21 Defendants.

Case No. 2:23-cv-01750-MMD-BNW

**STIPULATION AND ORDER TO
 EXTEND TIME FOR DISCOVERY**

(FIRST REQUEST)

22 Defendant Amentum Services, Inc, (“Defendant”) by and through its counsel, the law firm
 23 of Jackson Lewis P.C., and Plaintiffs Jonathon Hill and Phillip Rowton (“Plaintiffs”), by and through
 24 their counsel, McCracken, Stemerman & Holsberry, LLP, hereby stipulate and agree to extend the
 25 deadline to complete discovery **to October 30, 2024**. This Stipulation is submitted and based upon
 26 the following:

- 27 1. On October 27, 2023, Plaintiffs filed a Complaint naming Amentum Services, Inc,
 28 as Defendant.

1 2. On October 31, 2023, Plaintiffs served Defendant with a copy of the Summons and
2 Complaint.

3 3. On January 5, 2024, Defendant filed its Motion to Dismiss Plaintiff's Complaint.

4 4. On April 1, 2024, the Court denied Defendant's Motion to Dismiss. ECF No. 14.
5 The Court gave the Parties 180 days to complete discovery, to Saturday, September 28, 2024
6 (September 30, 2024).

7 5. Amentum's counsel was injured shortly thereafter, requiring an extension of time to
8 answer the complaint. Pursuant to stipulation, Defendant answered on May 1, 2024.

9 6. Pursuant to Local Rule 26-3, the Parties submit the following statements:

10 a. **Discovery completed:** The Parties timely completed initial disclosures, and
11 they have served written discovery requests on each other, including requests
12 for production of documents and interrogatories. They have provided
13 extensions on discovery deadlines due to the schedules of counsel.
14 Defendants responded to Plaintiffs' discovery on August 12, 2024, and
15 Plaintiffs' responses are due on September 14, 2024.

16 b. **Discovery that remains to be completed:** The Parties need additional time
17 to meet and confer regarding the discovery responses and to take depositions.
18 Plaintiffs intend to depose Defendant's 30(b)(6) representative, and
19 Defendant intends to depose Plaintiffs. The Parties are negotiating
20 deposition dates.

21 c. **Reasons why deadline was not completed:** The Parties have been working
22 diligently to obtain discovery and additional time is needed to complete
23 discovery prior to September 28, 2024, due to the schedules of the parties
24 and counsel in September.

25 d. **Proposed schedule:**

26 i. Discovery cut-off of **October 30, 2024**

27 ii. Written discovery completed by September 14, 2024

28 iii. Depositions completed by October 14, 2024

 iv. Follow-up completed by October 28, 2024

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7. This is the first request for an extension of time to complete discovery and is made more than 21 days in advance of the current discovery cut-off on September 28, 2024.

8. This request is made in good faith and not for the purpose of delay. The Parties have been working diligently to obtain discovery and additional time is needed to complete discovery due to the schedules of the parties and counsel.

DATED this 28th day of August, 2024.

McCracken, Stemerma & Holsberry, LLP

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Attorneys for Plaintiffs

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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: August 29, 2024