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9 *Attorneys for Plaintiff/Counterdefendant*
Sky Law Group

10 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12 SKY LAW GROUP, a California Professional
Corporation,

13
14 Plaintiff,

15 vs.

16 PAUL PADDALAW, PLLC, a Nevada
Professional Limited Liability Company; and
DARSHPAUL S. PADDALAW, ESQ., an individual,

17
18 Defendants.

19 AND RELATED CLAIMS.

Case No. 2:23-cv-01793-CDS-MDC

**STIPULATION AND ORDER TO WITHDRAW,
WITHOUT PREJUDICE, SKY LAW'S MOTION
TO COMPEL DISCOVERY**

20
21 Plaintiff Sky Law Group ("Sky Law") and Defendants Paul Padda Law, PLLC ("Padda
22 Law") and Darshpaul S. Padda, Esq. ("Mr. Padda" and together, the "Padda Defendants") stipulate
23 and agree as follows:

24 1. On August 14, 2024, Sky Law filed its Motion to Compel Discovery [ECF Nos. 43 &
25 45] (the "Motion to Compel"). According to Sky Law, it had been preparing this Motion to Compel
26 for weeks and it reflected meet-and-confer efforts that had spanned months.

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1 2. After filing the Motion to Compel, on August 21, 2024, the parties received notice of
2 U.S. Magistrate Judge Maximiliano D. Couvillier III’s Standing Order & Chambers Practices (the
3 “Standing Order”) [ECF No. 46].

4 3. The Standing Order substantially modifies the normal practice under existing law and
5 rules for resolving discovery disputes. As relevant here, the Standing Order requires the parties to
6 file a “Stipulation Regarding Discovery Dispute” as a condition precedent to any motion to compel
7 (if necessary). Standing Order § II.B.

8 4. On August 27, 2024, the day before the Padda Defendants’ response to the Motion to
9 Compel was due, Mr. Padda contacted Sky Law’s counsel and requested that Sky Law withdraw the
10 Motion to Compel, without prejudice, in order to follow the process outlined in the Standing Order.

11 5. While reserving all rights, Sky Law agrees to withdraw its Motion to Compel so that
12 the parties may follow the discovery dispute process outlined in the Standing Order.

13 6. By withdrawing the Motion to Compel, Sky Law is not waiving any rights or
14 arguments of any kind, including those raised in the Motion to Compel.

15 7. The Stipulation Regarding Discovery Disputes, as outlined in the Standing Order,
16 will be filed no later than September 5, 2024.

17 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

18 DATED this 28th day of August, 2024.

 DATED this 28th day of August, 2024.

19 BAILEY ❖ KENNEDY

 KERN LAW, LTD.
 PAUL PADDALAW, PLLC

20 By: /s/ Joshua P. Gilmore

 By: /s/ Paul S. Padda

21 DENNIS L. KENNEDY
22 JOSHUA P. GILMORE
 TAYLER D. BINGHAM

 ROBERT KERN
 DARSHPAUL S. PADDALAW

23 Attorneys for Plaintiff/Counterdefendant
 SKY LAW GROUP

 Attorneys for Defendants and Counterclaimant
 PAUL PADDALAW, PLLC and
 DARSHPAUL S. PADDALAW, ESQ.

24
25 **IT IS SO ORDERED.**

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27 _____
 UNITED STATES MAGISTRATE JUDGE

28 DATED: 08-30-24