

1 DANIEL A. MANN, 15594
 2 MARK A. DOMBROFF (PHV Admitted)
 3 JAMES A. EASTWOOD (PHV Admitted)
FOX ROTHSCHILD LLP
 4 One Summerlin
 1980 Festival Plaza Dr., Suite 700
 Las Vegas, Nevada 89135
 And
 5 2020 K Street, N.W.
 Suite 500
 6 Washington, DC 20006
 Telephone: 702.699.5936
 7 202.461.3100
 Fax No.: 702.597.5503
 8 dmann@foxrothschild.com
 9 mdombroff@foxrothschild.com
 jeastwood@foxrothschild.com

10 *Attorneys for Defendants*

11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

13 JOHN EDWARD CLARK, individually,
 14 ANGELIQUA CHENEE GROCE,
 individually, and DANNESHA
 15 KIRKWOOD,
 individually,
 16 Plaintiff,

17 vs.

18 SUN COUNTRY HOLDINGS, INC., a
 19 foreign corporation; DOE INDIVIDUALS I
 through X, inclusive; and ROE ENTITIES I
 20 through X, inclusive,
 Defendants.
 21

Case No. 2:24-cv-00379-CDS-BNW

**STIPULATION TO EXTEND TIME
 FOR PARTIES TO SERVE
 DISCLOSURE OF EXPERTS AND
 EXPERT REPORTS**

**Current deadline: June 24, 2024, for
 Initial Expert and July 22, 2024, for
 Rebuttal Expert
 New deadline: August 23, 2024, for Initial
 Expert and September 20, 2024, for
 Rebuttal Expert**

22
 23
 24 Plaintiffs, JOHN EDWARD CLARK, individually, ANGELIQUA CHENEE GROCE,
 25 individually, and DANNESHA KIRKWOOD, individually (“Plaintiffs”), by and through their
 26 counsel of record, MICHAEL L. SHIRTS, ESQ., of DIMOPOULOS INJURY LAW; Defendant
 27 SUN COUNTRY AIRLINES HOLDINGS, INC. (“Sun Country”), by and through its counsel,
 28

1 DANIEL A. MANN, ESQ., MARK A. DOMBROFF, ESQ., and JAMES A. EASTWOOD,
2 ESQ., of FOX ROTHSCHILD LLP, hereby stipulate to extend the deadline for Parties to serve
3 their disclosure of experts and expert reports for a period of sixty (60) days, up to and
4 including **August 23, 2024**.

5
6 1. On April 4, 2024, the Court issued an Order setting the discovery schedule.

7
8 2. Per the Court's Order, the deadline for Parties to serve disclosure of experts and
9 expert reports was by June 24, 2024.

10 3. The parties are looking to mediate this matter and require this deadline to be
11 extended to provide ample time to schedule a date to avoid unnecessary litigation costs before
12 mediation.

13
14 4. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
15 serve their disclosure of experts and expert reports for a period of sixty (60) days, up to and
16 including **August 23, 2024**.

17
18 5. This deadline extension would require the deadline for rebuttal expert disclosures
19 to be extended as well to avoid the deadline to be before the initial disclosures of expert witnesses.

20 6. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
21 serve their disclosure of rebuttal experts and expert reports for a period of sixty (60) days,
22 **September 20, 2024**, which is 29 days after disclosure of experts since the typical 30 days falls
23 on a Saturday.

24
25 8. The Parties respectfully request that the Court enter an Order consistent with the
26 Parties' Stipulation as detailed herein.

1 DATED this 3rd day of June, 2024

2 **FOX ROTHSCHILD LLP**

3 */s/ Daniel A. Mann*

4 DANIEL A. MANN, 15594
5 MARK A. DOMBROFF (PHV Admitted)
6 JAMES A. EASTWOOD (PHV Admitted)

7 **FOX ROTHSCHILD LLP**

8 One Summerlin
9 1980 Festival Plaza Dr., Suite 700
10 Las Vegas, Nevada 89135

11 And
12 2020 K Street, N.W.

13 Suite 500
14 Washington, DC 20006
15 dmann@foxrothschild.com
16 mdombroff@foxrothschild.com
17 jeastwood@foxrothschild.com

18 *Attorneys for Defendants*

19 **DIMOPOULOS INJURY LAW**

20 */s/ Michael L. Shirts*

21 MICHAEL L. SHIRTS, ESQ.
22 Nevada Bar No. 10223
23 6671 South Las Vegas Boulevard, Suite 275
24 Las Vegas, Nevada 89119
25 ms@stevedimopoulos.com
26 *Attorney for Plaintiffs*

1 DANIEL A. MANN, 15594
2 MARK A. DOMBROFF (PHV Admitted)
3 JAMES A. EASTWOOD (PHV Admitted)
4 **FOX ROTHSCHILD LLP**
5 One Summerlin
6 1980 Festival Plaza Dr., Suite 700
7 Las Vegas, Nevada 89135
8 And
9 2020 K Street, N.W.
10 Suite 500
11 Washington, DC 20006
12 Telephone: 702.699.5936
13 202.461.3100
14 Fax No.: 702.597.5503
15 dmann@foxrothschild.com
16 mdombroff@foxrothschild.com
17 jeastwood@foxrothschild.com

18 *Attorneys for Defendants*

19 UNITED STATES DISTRICT COURT

20 DISTRICT OF NEVADA

21 JOHN EDWARD CLARK, individually,
22 ANGELIQUA CHENEE GROCE,
23 individually, and DANNESHA
24 KIRKWOOD,
25 individually,
26 Plaintiff,

27 vs.

28 SUN COUNTRY HOLDINGS, INC., a
foreign corporation; DOE INDIVIDUALS I
through X, inclusive; and ROE ENTITIES I
through X, inclusive,
Defendants.

Case No. 2:24-cv-00379-CDS-BNW

**[PROPOSED] ORDER ON
STIPULATION TO EXTEND TIME FOR
PARTIES TO SERVE DISCLOSURE OF
EXPERTS AND EXPERT REPORTS**

**Current deadline: June 24, 2024, for Initial
Expert and July 22, 2024, for Rebuttal
Expert
New deadline: August 23, 2024, for Initial
Expert and September 20, 2024, for
Rebuttal Expert**

29 ///

30 ///

31 ///

32 ///

33 ///


34 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The Court, having considered the Parties' Stipulation to Extend Time for Parties to Serve Disclosures of Experts and Expert Reports, and good cause appearing, hereby ORDERS that Parties shall serve their disclosures of initial expert witnesses and initial expert reports on or before **August 23, 2024**, and Parties shall serve their disclosures of rebuttal expert witnesses and rebuttal expert reports on or before **September 20, 2024**.

IT IS SO ORDERED.

Dated this 4 day of June, 2024.

By  _____
Hon. Brenda Weksler
Magistrate Judge