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7 Attorneys for Plaintiff
 STATE FARM FIRE AND CASUALTY COMPANY as
 8 Subrogee of THOR JORGENSEN

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 STATE FARM FIRE AND CASUALTY
 12 COMPANY as Subrogee of THOR
 12 JORGENSEN,

13 CASE NO.: 2:24-cv-01543-CDS-BNW

14 Plaintiff,
 15 vs.

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES
 (SECOND REQUEST)**

16 SPACOM, L.L.C. dba BATCADDY LLC, a
 17 foreign limited liability company; DOES I - v,
 17 inclusive; ROE CORPORATIONS I - V,
 18 inclusive,

19 Defendants.

20
 Pursuant to LR IA6-1(a), LR IA 6-2, and LR 26-3, Plaintiff STATE FARM FIRE AND
 21 CASUALTY COMPANY, as Subrogee of THOR JORGENSEN, by and through its counsel of
 22 record George F. Hand, Esq. and Samantha A. Herbeck, Esq., from the law firm of DOC. #6
 23 HAND & SULLIVAN, LLC and Defendant SPACOM, LLC., by and through its attorney of record Richard
 24 Waltjen, Esq. from the law firm of PYATT SILVESTRI (collectively referred to as the "Parties"),
 25 hereby stipulate and agree to extend the Discovery Deadlines in the current Discovery Plan and
 26 Scheduling Order in this matter for a period of 60 days.
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1 **A. DISCOVERY COMPLETED**

2 1. Plaintiff has made initial disclosures of witnesses and documents;

3 2. Defendant has made initial disclosures of witnesses and documents;

4 3. Plaintiff has made supplemental disclosures of witnesses and documents;

5 4. Defendant has made supplemental disclosure of witnesses and documents;

6 5. Plaintiff has made their first set of interrogatories to Defendants;

7 6. Plaintiff has made their first set of requests for production of documents to

8 Defendants;

9 7. Defendant has made their responses to Plaintiff's first set of interrogatories;

10 8. Defendant has made their responses to Plaintiff's first set of requests for

11 production of documents;

12 9. Defendant has made their first set of interrogatories to Plaintiff;

13 10. Defendant has made their first set of requests for production of documents to

14 Plaintiff;

15 11. Defendant has made their first of requests for admissions to Plaintiff;

16 12. Defendant has made their second set of requests for production of documents

17 to Plaintiff;

18 13. Plaintiff has made their responses to Defendants first set of interrogatories;

19 and

20 14. Plaintiff has made their responses to Defendants first set of requests for

21 production of documents;

22 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

23 1. Plaintiffs responses to Defendants first set of requests for admissions.

24 2. Plaintiffs responses to Defendants second set of requests for production of

25 documents.

26 3. The deposition of Defendant's 30(b)(6) Witness is currently scheduled for

27 March 11, 2025.

28 4. The deposition of Thor Jorgensen.

- 1 5. The deposition of Jette Jorgensen.
- 2 6. The deposition of Plaintiffs 30(b)(6) Witness.
- 3 7. Additional Depositions, including expert depositions, remain to be
- 4 completed by both parties
- 5 8. Additional Written Discovery remains to be completed by both parties.
- 6 9. Initial and Rebuttal Expert disclosures remain to be completed by both
- 7 parties.
- 8 10. Other further appropriate discovery may also be necessary.

9 **C. REASONS WHY DISCOVERY REMAINING WAS NOT COMPLETED**

10 The parties have been working diligently to complete discovery; however, due to the
11 scheduling of depositions, other discovery has been delayed. Thus, although the parties have made
12 every effort to cooperate throughout the process, they nonetheless will be unable to complete
13 discovery before the current deadlines expire.

14 The proposed extension will provide the parties with the time needed to complete the
15 remaining discovery necessary for the parties' claims and defenses.

16 This Request is not sought for any improper purpose or other purpose of delay. Rather, it is
17 sought by the parties for the purpose of conducting all necessary discovery.

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	D. DISCOVERY DEADLINES	Current	Joint Proposed Amended
1	1. Close of Discovery	05/16/2025	07/15/2025
2	2. Final Dates for Expert Disclosures		
3	(a) Initial Disclosures	03/17/2025	05/16/2025
4	(b) Rebuttal Disclosures	04/15/2025	06/13/2025
5	3. Dispositive Motions	06/13/2025	08/12/2025
6	4. Pretrial Order	07/15/2025	11/12/2025
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8			
9			
10	HAND & SULLIVAN, LLC		PYATT SILVESTRI
11	Dated: March 3, 2025		Dated: March 3, 2025
12	<u>/s/ George F. Hand</u> George F. Hand, Esq. (#8483)		<u>/s/ Richard Waltjen</u> James P.C. Silvestri, Esq (#3603)
13	Samantha A. Herbeck, Esq. (#14542)		Richard Waltjen, Esq. (#13416)
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15	Las Vegas, Nevada 89129		Las Vegas, Nevada 89128
	<i>Attorneys for Plaintiff</i>		<i>Attorneys for Defendant</i>
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ORDER

Upon Stipulation of the parties;

IT IS SO ORDERED that the discovery deadlines be extended as follows:

1.	Close of Discovery	07/15/2025
2.	Final Dates for Expert Disclosures	
	(a) Initial Disclosures	05/16/2025
	(b) Rebuttal Disclosures	06/13/2025
3.	Dispositive Motions	08/12/2025
4.	Pretrial Order	11/12/2025

Dated this 5 day of March, 2025.

Barb Weiden
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted this 3rd day of March, 2025.

HAND & SULLIVAN, LLC

/s/ George F. Hand
George F. Hand, Esq.
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Attorneys for Plaintiff

Juliana Cerriteno

From: Richard Waltjen <rwaltjen@pyattsilvestri.com>
Sent: Friday, February 28, 2025 7:40 AM
To: Juliana Cerriteno
Cc: George Hand; Samantha Herbeck; Michelle Mockbee
Subject: RE: State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good morning,

I reviewed the Second SAO to Extend Discovery Deadlines. You have my authorization to use my esignature.

Thanks

Richard Waltjen
Associate Attorney



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From: Juliana Cerriteno <Julianac@handsullivan.com>
Sent: Thursday, February 27, 2025 4:31 PM
To: Richard Waltjen <rwaltjen@pyattsilvestri.com>
Cc: George Hand <ghand@handsullivan.com>; Samantha Herbeck <sherbeck@handsullivan.com>; Michelle Mockbee <mmockbee@pyattsilvestri.com>
Subject: State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good Afternoon Mr. Waltjen,

Attached please find draft of SAO to Extend Discovery Deadlines for your review. If you have any requested revisions please use redlines, if none please confirm we have authority to affix your e-signature to the SAO for submission to the court. Thank you.

Sincerely,
Juliana Cerriteno, Paralegal
Hand & Sullivan, LLC
Julianac@handsullivan.com