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

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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

Plaintiff,

vs.

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

Defendants.

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

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

Pursuant to LR IA6-1(a), LR IA 6-2, and LR 26-3, Plaintiff STATE FARM FIRE AND
CASUALTY COMPANY, as Subrogee of THOR JORGENSEN, by and through its counsel of
record George F. Hand, Esq. and Samantha A. Herbeck, Esq., from the law firm of HAND &
SULLIVAN, LLC and Defendant SPACOM, LLC., by and through its attorney of record Richard
Waltjen, Esq. from the law firm of PYATT SILVESTRI (collectively referred to as the "Parties"),
hereby stipulate and agree to extend the Discovery Deadlines in the current Discovery Plan and
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.

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

C. REASONS WHY DISCOVERY REMAINING WAS NOT COMPLETED

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

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

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

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1	D. DISCOVERY DEADLINES	Current	Joint Proposed Amended
2			
3	1. Close of Discovery	05/16/2025	07/15/2025
4	2. Final Dates for Expert Disclosures		
5	(a) Initial Disclosures	03/17/2025	05/16/2025
6	(b) Rebuttal Disclosures	04/15/2025	06/13/2025
7	3. Dispositive Motions	06/13/2025	08/12/2025
8	4. Pretrial Order	07/15/2025	11/12/2025

9

10 **HAND & SULLIVAN, LLC**

11 Dated: March 3, 2025

12 /s/ George F. Hand
 13 George F. Hand, Esq. (#8483)
 14 Samantha A. Herbeck, Esq. (#14542)
 15 3442 North Buffalo Drive
 Las Vegas, Nevada 89129
Attorneys for Plaintiff

PYATT SILVESTRI

Dated: March 3, 2025

/s/ Richard Waltjen
 James P.C. Silvestri, Esq. (#3603)
 Richard Waltjen, Esq. (#13416)
 7670 W. Lake Mead Blvd., Suite 250
 Las Vegas, Nevada 89128
Attorneys for Defendant

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.


UNITED STATES MAGISTRATE JUDGE

Respectfully submitted this 3rd day of March, 2025.

HAND & SULLIVAN, LLC

/s/ George F. Hand
George F. Hand, Esq.
Nevada Bar No. 8483
Samantha A. Herbeck, Esq.
Nevada Bar No. 14542
3442 N. Buffalo Drive
Las Vegas, Nevada 89129
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