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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ALEXIS MOORE, individually,

13 Plaintiff,

14 vs.

15 DEALFI LLC, a limited liability company;
16 DOES I through X; and ROE CORPORATIONS
17 I through X, inclusive,

18 Defendants.

Case No.: 2:24-cv-02078-GMN-DJA

**~~PROPOSED~~ JOINT PROPOSED DISCOVERY PLAN
AND SCHEDULING ORDER**

19 Plaintiff, ALEXIS MOORE (“Plaintiff”), by and through her counsel of record, the law firm
20 MAIER GUTIERREZ & ASSOCIATES, and defendant DEALFI LLC (“Defendant”), by and through its
21 counsel of record, the law firm HOLLAND & HART, LLP, hereby submit this proposed joint discovery
22 plan and scheduling order.

23 **FRCP 26(f) Conference.** On January 14, 2025, Danielle J. Barraza, Esq., counsel for
24 Plaintiff, and Sydney R. Gambee, Esq., as counsel for Defendant, participated in a discovery and
25 scheduling conference (the “Conference”) to discuss all of the issues required by Federal Rule Civil
26 Procedure 26(f). The parties’ initial disclosures will be made as soon as practicable, and in any event
27 no later than January 27, 2025. The parties propose the following discovery plan:

- 28 1. **Discovery Cut-Off Date:** The proposed cut-off date for discovery shall be

1 July 14, 2025, 180 days from the date of Defendant's responsive pleading filed on January 13, 2025.

2 2. **Amending the Pleadings and Adding Parties:** All motions to amend the
3 pleadings or to add parties shall be filed no later than April 15, 2025, ninety (90) days prior to the
4 proposed close of discovery.

5 3. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** Disclosures concerning initial
6 experts shall be made by May 15, 2025, sixty (60) days before the proposed discovery cut-off date.
7 Disclosures concerning rebuttal experts shall be made by June 16, 2025, thirty (30) days after the
8 initial disclosure of experts.

9 4. **Dispositive Motions:** The date for filing dispositive motions shall not be later
10 than August 13, 2025, thirty (30) days after the proposed discovery cut-off date. In the event that the
11 discovery period is extended from the discovery cut-off date set forth in this proposed discovery plan
12 and scheduling order, the date for filing dispositive motions shall be extended to be not later than
13 thirty (30) days from the subsequent discovery cut-off date.

14 5. **Pretrial Order:** The date for filing the joint pretrial order shall not be later
15 than September 12, 2025, thirty (30) days after the cut-off for filing dispositive motions. In the event
16 that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until
17 thirty (30) days after the decision on the dispositive motions or until further order of the Court. In the
18 further event that the discovery period is extended from the discovery cut-off date set forth in this
19 discovery plan and scheduling order, the date for filing the joint pretrial order shall be extended in
20 accordance with the time periods set forth in this paragraph.

21 6. **Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ.
22 P. 26(a)(3), and any objections hereto, shall be included in the joint pretrial order.

23 7. **Alternative Dispute Resolution:** The parties certify that they met and
24 conferred about the possibility of using alternative dispute resolution processes, including mediation
25 and arbitration. The parties agree to participate in the upcoming ENE in good faith.

26 8. **Alternative Forms of Case Disposition:** The parties certify that they have
27 discussed the possibility of trial by the magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P.
28 73 and the use of the Short Trial Program (General Order 2013-01), and agree that this case is properly

1 suited before the District Court.

2 9. **Electronic Evidence:** The parties certify that they have discussed whether
3 they intend to present evidence in electronic format to jurors for the purposes of jury deliberations.
4 The parties stipulate to provide discovery in an electronic format compatible with the Court's
5 electronic jury evidence display system, to the extent practicable, and to the extent it is not practicable,
6 the parties shall meet and confer and otherwise work in good faith with respect to the presentation of
7 electronically stored information should any dispute arise.

8 10. **Extensions or Modifications of the Discovery Plan and Scheduling**

9 **Order:** Any stipulation or motion must be made pursuant to LR 26-3 and be supported
10 by a showing of good cause, no later than twenty-one (21) days before the subject deadline.

11 11. **Subjects of Discovery:** The parties agree that discovery may be taken on any
12 subjects permitted by the Federal Rules of Civil Procedure, including all aspects of Plaintiffs' claims
13 and Defendant's defenses in this matter.

14 12. **Discovery Phases:** The parties do not believe it is necessary to conduct
15 discovery in phases.

16 13. **Document Production:** All documents produced in this action will be
17 delivered as either hardcopy documents or searchable/OCR Portable Document Format ("PDF")
18 images unless the requesting party specifically requests that any responsive electronic documents be
19 produced in native format.

20 14. **Written Discovery:** The parties mutually agree to provide Word versions of
21 any propounded written discovery requests to the responding party so as to facilitate the process of
22 providing responses.

23 15. **E-Service of Discovery:** The parties agree to electronic service of documents
24 and discovery not otherwise served through the CM/ECF. Plaintiff's e-service list is as follows:
25 Danielle J. Barraza, Esq. (djb@mgalaw.com) and Trinity R. McDonald (trm@mgalaw.com).
26 Defendant's e-service list is as follows: Tyson Horrocks (tchorrocks@hollandhart.com), Sydney
27 Gambee (sgambee@hollandhart.com), and Vita Garrett (vsgarrett@hollandhart.com). The parties
28 shall advise each other in a timely manner of any changes to the e-service contacts.

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16. **Protective Orders For Confidential Documents And/Or Information:** The parties have discussed the potential need for a protective order for confidential documents and/or information, and will meet and confer on the terms of a stipulated protective order should one be proposed.

DATED this 27th day of January 2025.

DATED this 27th day of January 2025.

MAIER GUTIERREZ & ASSOCIATES

HOLLAND & HART, LLP

/s/ Danielle J. Barraza

/s/ Sydney R. Gambia

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 1/28/2025