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26 *OTIS ELEVATOR COMPANY*

27 UNITED STATES DISTRICT COURT

28 DISTRICT OF NEVADA

29  
30 MANSOUR AFSHARALMANCHI, an  
31 individual,

32 Plaintiff,

33 v.  
34  
35 OTIS ELEVATOR COMPANY; a Foreign  
36 Corporation; DOES I through X; and ROE  
37 CORPORATIONS I through X, inclusive;  
38 Defendants.

39 EJY  
40 CASE NO.: 2:24-cv-02178-JAD-~~NJK~~

41 **STIPULATION AND ORDER TO  
42 EXTEND DISCOVERY PLAN AND  
43 SCHEDULING ORDER**

44 **(First Request)**

COMES NOW, Plaintiff MANSOUR AFSHARALMANCHI, by and through his attorneys of record, the law firm HEIDARI LAW GROUP and Defendant OTIS ELEVATOR COMPANY by and through its counsel of record, the law firms ROGERS, MASTRANGELO, CARVALHO, AND MITCHELL and TUCKER ELLIS LLP, and hereby request the discovery deadlines in the previously filed Order [Doc 11] be extended by ninety (90) days, pursuant to FRCP 29 and LR 26.4, as follows:

**A. DISCOVERY COMPLETED TO DATE**

- The parties have conducted a FRCP 26(f) conference;
- The parties have served their respective FRCP 26(a) disclosures;
- Defendant has served upon Plaintiff one set of Requests for Production and one set of Interrogatories. Plaintiff has responded.;
- Plaintiff provided provider specific authorizations;
- Defendant served a Subpoena Duces Tecum on Venetian Las Vegas Gaming, LLC and obtained documents, photographs, and video surveillance.

**B. DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Obtain Plaintiff's relevant medical provider records from numerous medical providers;
- Coordinate and schedule a site inspection of the Subject Elevator;
- Defendant needs to depose Plaintiff;
- Defendant needs to depose other occupants in the elevator at the time of the Subject Incident;
- Defendant need to conduct expert discovery on Plaintiff, inclusive of, e.g., Rule 35 examination(s);
- Depositions of numerous expert witnesses and rebuttal expert witnesses;
- Depositions of Plaintiff's treating physicians; and
- Additional written discovery and depositions as necessary.

The parties agree, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

1 Plaintiff Mansour Afsharalmanchi alleges serious injuries and other related damages as a result of  
2 an alleged elevator drop on August 3, 2022 at The Venetian Hotel. There were 15 other hotel  
3 employees in the elevator with him. On May 20, 2024, Alma Vargas, one of the passengers on the  
4 elevator with Plaintiff, filed a Complaint in the Eighth Judicial District Court for Clark County  
5 alleging identical causes of action against Defendant. Otis filed a Notice of Removal for Alma  
6 Vargas; however the case was remanded for lack of subject matter jurisdiction. (See, 2:24-cv-01148  
7 [Doc 12]. The parties have been working diligently to complete discovery in this matter, along with  
8 the Vargas matter, but there is some overlap in the discovery for both cases. Specifically, due to  
9 logistical challenges in scheduling depositions of fact witnesses and a site inspection in both cases,  
10 additional time is required. A brief extension in the current discovery plan would assist in ensuring  
11 a comprehensive and equitable discovery process.

12 **C. PROPOSED PLAN FOR COMPLETING DISCOVERY**

Event	Current Deadline	Proposed Deadline
Amending the Pleadings and Adding Parties	<b>March 26, 2025</b>	<b>June 24, 2025</b>
Initial Expert Disclosure	<b>April 27, 2025</b>	<b>August 25, 2025</b>
Rebuttal Expert Disclosures	<b>May 27, 2025</b>	<b>September 25, 2025</b>
Discovery Cut-Off Date	<b>June 24, 2025</b>	<b>October 22, 2025</b>
Dispositive Motions	<b>July 24, 2025</b>	<b>November 21, 2025</b>
Joint Pre-Trial Order, if No Dispositive Motions	<b>August 25, 2025</b>	<b>December 22, 2025</b>

23 **D. THE CURRENT TRIAL DATE**

24 This matter has not been scheduled for trial.

25 **E. NUMBER OF REQUESTS FOR EXTENSION**

26 This is the first request to extend discovery deadlines.

Dated this 11th day of March, 2025

## HEIDARI LAW GROUP, PLLC

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Dated this 11th day of March, 2025

ROGERS, MASTRANGELO, CARVALHO  
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Dated this 11th of March, 2025

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## IT IS SO ORDERED

Leyna J. Zouchah

United States Magistrate Judge

DATED: March 11, 2025