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9
 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 Carlos Guzman,

13 Plaintiff,

14 v.

15 Westlake Services, LLC and Speedy
 16 Recovery, Inc.,

17 Defendants.

Case No.: 2:24-cv-02236-GMN-NJK

**Discovery Plan and Scheduling
 Order Submitted in Compliance
 with LR 26-1(b)**

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 20 On December 31, 2024, Westlake Services, LLC appeared in this case and the
 21 Court set a deadline to file a proposed discovery plan and scheduling order by
 22 February 14, 2025. Accordingly, Carlos Guzman, Westlake Services, LLC and
 23 Speedy Recovery, Inc. (collectively as the “Parties”), by and through their respective
 24 counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties
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1 will require 180 days of discovery measured from the date that Westlake Services,
2 LLC filed its answer to Plaintiff's complaint.

3 **DISCOVERY PLAN**

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5 The parties propose the following discovery plan and scheduling order:

- 6 1. Initial disclosures ~~March 3, 2025~~ February 14, 2025
7 2. Amend pleadings and add parties .. March 31, 2025
8 3. Expert disclosures (initial): April 30, 2025
9 4. Expert disclosures (rebuttal): May 30, 2025
10 5. Discovery cutoff date: June 30, 2025
11 6. Dispositive motions: July 29, 2025
12 7. Pretrial order August 28, 2025

13 In the event that dispositive motions are filed, the date for filing the joint
14 pretrial order shall be suspended until **30 days after** decision on the dispositive
15 motions or until further order of the court.

16 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
17 objections thereto, shall be included in the joint pretrial order.

18 Extensions or Modifications of the Discovery Plan and Scheduling Order:
19 Applications to extend any date set by the discovery plan, scheduling order, or other
20 order must comply with the Local Rules.

21 Protective Order: The parties may seek to enter a stipulated protective order
22 pursuant to Rule 26(c) prior to producing any confidential documents.
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1 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
3 served by sending such documents by email.
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5 Alternative Dispute Resolution Certification: The parties certify that they met
6 and conferred about the possibility of using alternative dispute-resolution processes
7 including mediation, arbitration, and early neutral evaluation. The parties have not
8 reached any stipulations at this stage.
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10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.
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15 Electronically Stored Information: The parties have discussed the retention
16 and production of electronic data. The parties agree that service of discovery by
17 electronic means, including sending original electronic files by email or on a cd is
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.
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1 Electronic evidence conference certification: The parties further intend to
2 present evidence in electronic format to jurors for the purposes of jury deliberations
3 at trial. The parties discussed the presentation of evidence for juror deliberations but
4 did not reach any stipulations as to the method as this early stage.
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6 Dated: January 28, 2025.
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8 **FREEDOM LAW FIRM**

9 /s/ George Haines

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