



MYSTY LANGFORD, ESQ.  
 Nevada Bar No. 16909  
**RICHARD HARRIS LAW FIRM**  
 801 South Fourth Street  
 Las Vegas, Nevada 89101  
 P: (702) 444-4444  
 F: (702) 444-4455  
 E: mlangford@richardharrislaw.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ROSE BROWN, individually;

Plaintiff,

v.

GNLV, LLC d/b/a GOLDEN NUGGET LAS  
VEGAS HOTEL AND CASINO

Defendants.

CASE NO.: 2:24-cv-02404-JAD-MDC

**DISCOVERY PLAN AND SCHEDULING  
ORDER**

**(SPECIAL SCHEDULING REVIEW  
REQUESTED)**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1(a), the parties submit their proposed Discovery Plan and Scheduling Order. Deadlines that fall on a Saturday, Sunday, or legal holiday have been scheduled for the next judicial day.

1. **Meeting:** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on March 1, 2025, and was attended telephonically by Mysty Langford, Esq. of Richard Harris Law Firm for Plaintiff Rose Brown ("Plaintiff") and by I-Che Lai, Esq. of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP for Defendant GNLV, LLC d/b/a GOLDEN NUGGET LAS VEGAS HOTEL AND CASINO ("Defendant").
2. **Pre-Discovery Disclosures:** Plaintiff and Defendant have agreed that they will respectively serve their disclosures on or before March 17, 2025.
3. **Areas of Discovery:** The parties agree that the areas of discovery should include, but not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.
4. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan.

1                   **A. Discovery Cut-Off Date:**

2                   The parties jointly request a change to LR 2601(b)(1) to extend the discovery  
3                   period to 9 months (270 days). Defendant filed its *Petition for Removal* on  
4                   December 26, 2024 [ECF No. 1], along with a *Notice of Removal* in the state  
5                   action. Defendant first appeared in the matter by filing its *Answer* on December  
6                   30, 2024 [ECF No. 4]. As a result of the removal, the parties have not yet been  
7                   able to commence conducting discovery. The parties need to negotiate certain  
8                   confidentiality structures to govern certain items of discovery and analysis of  
9                   pertinent video evidence as well as inquiry into the extent and nature of Plaintiff's  
10                  injuries. The nature of the injuries require the collection of extensive medical  
11                  records which supports the extended discovery period. The parties therefore  
12                  request that the discovery period be set for 270 days, calculated from the date of  
13                  the conduct of the FRCP 26(f) Case Conference, March 1, 2025, such that  
14                  discovery closes on November 26, 2025. This extended period allows the parties  
15                  to complete necessary discovery into Plaintiff's extensive injuries.

16                  **B. Amending the Pleadings and Adding Parties:** The parties shall have until  
17                  August 28, 2025, to file any motions to amend the pleadings and/or to add parties.  
18                  This date is 90 days before the discovery cut-off date.

19                  **C. Fed. R. Civ. P. 26(a)(2) Disclosure of Experts:** Disclosure of expert shall  
20                  proceed according to Fed. R. Civ. P. 26(a)(2) and LR 26-1(b)(3) as follows:

- 21                   i. The disclosure of experts and their reports shall occur on or before  
22                   September 29, 2025. The expert disclosure deadline is 58 days before the  
23                   discovery cut-off date as the 30<sup>th</sup> day is Saturday, September 27, 2025,  
24                   and the deadline has been adjusted to the next following judicial day.  
25                   ii. The disclosure of rebuttal experts and their reports shall occur on or before  
26                   October 27, 2025. The rebuttal deadline is 30 days after the initial expert  
27                   disclosure deadline.  
28

- 1 D. **Dispositive Motions:** The parties shall have until December 26, 2025, to file  
2 dispositive motions. This is 30 days after the discovery cut-off date, as required  
3 by LR 26-1(b)(4).  
4
- 5 E. **Pre-Trial Order:** The parties will prepare a Consolidated Pre-Trial Order on or  
6 before January 26, 2026, which is 31 days after the date set for filing dispositive  
7 motions as the 30<sup>th</sup> day is Sunday, January 25, 2026, and the deadline has been  
8 adjusted to the next following judicial day as required by LR 26-1(b)(5). This  
9 deadline will be suspended if dispositive motions are timely filed until 30 days  
10 after the decision of the dispositive motions or until further Order of the Court.  
11 The disclosures required by Fed. R. Civ. P. 26(a)(3), and objections thereto, shall  
12 be included in the pre-trial order.
- 13 F. **Court Conferences:** If the Court has questions regarding the dates proposed by  
14 the parties, the parties request a conference with the Court before entry of the  
15 Scheduling Order. If the Court does not have questions, the parties do not request  
16 a conference with the Court.
- 17 G. **Authorizations:** It is agreed that Plaintiff will provide Defendant with HIPAA  
18 Compliant Authorizations for the Release of Patient Information pursuant to 45  
19 CFR 164. The parties agree that in the event Plaintiff makes a claim for loss of  
20 wages or lost earning capacity, Plaintiff shall provide: (1) Consent for Release of  
21 Employment Information, left blank and (2) Authorization to Obtain Plaintiff's  
22 Tax Return information.  
23
- 24 H. **Format of Discovery:** Pursuant to the electronic discovery amendments to the  
25 Federal Rules of Civil Procedure, the parties addressed the e-discovery issues  
26 pertaining to the format of discovery at the Rule 26(f) conference. The parties do  
27 not anticipate discovery of native files or metadata at this time, but each party  
28 reserves the right to make a showing for the need of such electronic data as  
discovery progresses.

- I. **Alternative Dispute Resolution:** The parties certify that they have met and conferred about the possibility of using alternative dispute resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.
- J. **Alternative Forms of Case Disposition:** The parties certify that they considered consent to trial by magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
- K. **Electronic Evidence:** The parties certify that they discussed whether they intend to present evidence in electronic form to jurors for the purpose of jury deliberations. The parties have not reached any stipulations in this regard at this time.

DATED this 1<sup>st</sup> day of March 2025.

DATED this 3<sup>rd</sup> day of March 2025.

**RICHARD HARRIS LAW FIRM**

**WILSON, ELSE, MOSKOWITZ,  
EDELMAN & DICKER LLP**

/s/ Mysty Langford  
MYSTY LANGFORD, ESQ.  
Nevada Bar No. 16909  
801 South Fourth Street  
Las Vegas, NV 89101  
*Attorneys for Plaintiff*

/s/ I-Che Lai  
I-CHE LAI, ESQ.  
Nevada Bar No. 12247  
6689 Las Vegas Boulevard South, Ste. 200  
Las Vegas, NV 89119  
*Attorneys for Defendant GNLV, LLC*

**IT IS SO ORDERED.**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** 3-11-25