

1 JEFFREY J. KUMP
Nevada Bar No. 5694
2 MARVEL & KUMP, LTD
217 Idaho Street
3 Elko, NV 89801
Telephone: (775) 777-1204
4 Facsimile: (775) 738-0187
Attorneys for Plaintiff
5

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8

9 _____
10 DA-DAZE-NOM MANZANARES,

11 Plaintiff,

CASE NO. 3:07-CV-00076

12 vs.

13 ELKO COUNTY SCHOOL DISTRICT, and
GARY LEE JONES, SR., as agent for ELKO
14 COUNTY SCHOOL DISTRICT, and GARY
LEE JONES, SR., individually, and
15 CORPORATION OF THE PRESIDING
BISHOP OF THE CHURCH OF JESUS
16 CHRIST OF LATTER - DAY SAINTS, a
foreign corporation registered to do business
17 in the State of Nevada; CORPORATION OF
THE PRESIDENT OF THE CHURCH OF
18 JESUS CHRIST OF LATTER-DAY SAINTS
AND SUCCESSORS, a foreign corporation
19 registered to do business in the State of
Nevada; and Does 1-5, and XYZ Corporations
20 1-5.

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER (SPECIAL
SCHEDULING REVIEW REQUESTED)**

21 Defendants.
22 _____/

23 Plaintiff, Da-daze-nom Manzanares, by and through her attorneys, Marvel & Kump, Ltd., and
24 Defendants Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter - Day Saints
25 and Corporation of The President of The Church of Jesus Christ of Latter-day Saints And
26 Successors' by and through their attorneys, Kent R. Robison of Robison, Belaustegui, Sharp & Low
27 and Defendant Gary Lee Jones, by and through his attorneys, Kelly Watson and Colt B. Dodrill of
28 Watson Rounds, P.C. and Defendant Elko County School District, by and through its attorney

MARVEL & KUMP, LTD.
Attorneys at Law
217 Idaho Street
Elko, Nevada 89801
(775) 738-9881

1 Thomas P. Beko of Erickson, Thorpe & Swainston, Ltd submit the following Stipulated Discovery
2 Plan and Scheduling Order, in compliance with LR 26-1(e), as follows:

3 1. Defendant Elko County School District filed its Answer on April 17, 2007; the parties
4 completed their Fed. R. Civ. P. 26(f) meeting on May 31, 2007;

5 2. The last day to complete discovery is Tuesday, November 27, 2007 (One hundred and
6 eighty (180) days from the Fed. R. Civ. P. 26(f) meeting on May 31, 2007, and one (1) month and
7 fifteen (15) days beyond LR 26-1(e)(1) requirement);

8 3. The last date to file motions to amend pleadings or to add parties is Thursday, August
9 30, 2007 (90 days prior to the close of discovery);

10 4. The last day for the parties to disclose experts is Friday, September 28, 2007 (60 days
11 prior to the close of discovery);

12 5. The last day for the parties to submit an interim status report (per LR 26-3) is Friday
13 September 28, 2007 (60 days prior to the close of discovery);

14 6. The last day for the parties to disclose of rebuttal expert witnesses is October 29,
15 2007 (29 days prior to the close of discovery);

16 7. The last day for filing dispositive motions is December 27, 2007 (30 days following
17 the close of discovery);

18 8. The last day for lodging with the court the proposed Joint Pretrial Order is Friday,
19 January 25, 2008 (29 days following the last day to file dispositive motions). However, should
20 dispositive motions be filed, in that event the date for filing the Joint Pretrial Order shall be
21 suspended until thirty (30) days after decision of all dispositive motions or as further ordered by the
22 court;

23 9. All initial motions or stipulations to extend discovery shall be received by the Court
24 by November 7, 2007 (20 days prior to the close of discovery); Subsequent or additional motions
25 or stipulations to extend the time for discovery shall be received by the Court at least twenty (20)
26 days prior to the expiration of any other extension of discovery that may have been approved by the
27 Court;

28

1 The parties have agreed that longer time periods should apply to this case as counsel have several
2 trials scheduled prior to the normal discovery cut off date.

3 RESPECTFULLY SUBMITTED this 14th day of June, 2007.

4 MARVEL & KUMP, LTD.
5 217 Idaho Street
6 Elko, Nevada 89801

7 
8 JEFFREY J. KUMP
9 Attorneys for Plaintiff
10 Nevada State Bar No. 5694

11 ERICKSON, THORPE & SWAINSTON,
12 LTD
13 99 W. Arroyo
14 P.O. Box 3559
15 Reno, NV 89505

16 THOMAS P. BECKO
17 Attorney for Defendant
18 Elko County School District
19 Nevada State Bar No. _____

20 WATSON ROUNDS, P.C.
21 5371 Kietzke Lane
22 Reno, NV 89511

23 KELLY WATSON
24 Attorney for Defendant
25 Gary Lee Jones, Sr.
26 Nevada State Bar No. _____

27 ROBISON, BELAUSTEGUI, SHARP &
28 LOW
71 Washington Street
Reno, NV 89503

KENT R. ROBISON
Attorney for Defendant's
President and Bishop of the Church of Jesus
Christ of Latter Day Saints
Nevada State Bar No. _____

IT IS SO ORDERED this 14th day of June, 2007.


UNITED STATES MAGISTRATE JUDGE

MARVEL & KUMP, LTD.
Attorneys at Law
217 Idaho Street
Elko, Nevada 89801
(775) 738-9881

ERICKSON, THORPE & SWAINSTON,
LTD
99 W. Arroyo
P.O. Box 3559
Reno, NV 89505



THOMAS P. BEKO
Attorney for Defendant
Elko County School District
Nevada State Bar No. 2563

WATSON ROUNDS, P.C.
5371 Kietzke Lane
Reno, NV 89511

KELLY WATSON
Attorney for Defendant
Gary Lee Jones, Sr.
Nevada State Bar No. _____

ROBISON, BELAUSTEGUI, SHARP &
LOW
71 Washington Street
Reno, NV 89503

KENT R. ROBISON
Attorney for Defendant's
President and Bishop of the Church of Jesus
Christ of Latter Day Saints
Nevada State Bar No. _____

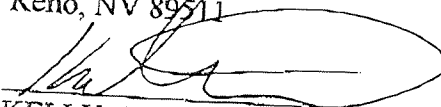
IT IS SO ORDERED this _____ day of _____, 2007.

UNITED STATES MAGISTRATE JUDGE

ERICKSON, THORPE & SWAINSTON,
LTD
99 W. Arroyo
P.O. Box 3559
Reno, NV 89505

THOMAS P. BECKO
Attorney for Defendant
Elko County School District
Nevada State Bar No. _____

WATSON ROUNDS, P.C.
5371 Kietzke Lane
Reno, NV 89511


KELLY WATSON
Attorney for Defendant
Gary Lee Jones, Sr.
Nevada State Bar No. 893

ROBISON, BELAUSTEGUI, SHARP &
LOW
71 Washington Street
Reno, NV 89503

KENT R. ROBISON
Attorney for Defendant's
President and Bishop of the Church of Jesus
Christ of Latter Day Saints
Nevada State Bar No. _____

IT IS SO ORDERED this _____ day of _____, 2007.

UNITED STATES MAGISTRATE JUDGE

MARVEL & KUMP, LTD.
Attorneys at Law
217 Idaho Street
Elko, Nevada 89801
(775) 738-9881

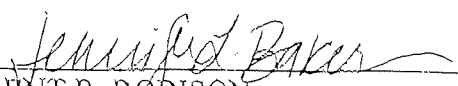
ERICKSON, THORPE & SWAINSTON,
LTD
99 W. Arroyo
P.O. Box 3559
Reno, NV 89505

THOMAS P. BECKO
Attorney for Defendant
Elko County School District
Nevada State Bar No. _____

WATSON ROUNDS, P.C.
5371 Kietzke Lane
Reno, NV 89511

KELLY WATSON
Attorney for Defendant
Gary Lee Jones, Sr.
Nevada State Bar No. _____

ROBISON, BELAUSTEGUI, SHARP &
LOW
71 Washington Street
Reno, NV 89503


KENT R. ROBISON
Attorney for Defendant's
President and Bishop of the Church of Jesus
Christ of Latter Day Saints
Nevada State Bar No. 9559

IT IS SO ORDERED this _____ day of _____, 2007.

UNITED STATES MAGISTRATE JUDGE

MARVEL & KUMP, LTD.
Attorneys at Law
217 Idaho Street
Elko, Nevada 89801
(775) 738-9881