WGM

1 2 3 4 5 6 7 8 9 10 11 12	 Scott E. Gizer, Nevada State Bar No. 12216 sgizer@earlysullivan.com EARLY SULLIVAN WRIGHT GIZER & McRAE LLP 601 South Seventh Street, 2nd Floor Las Vegas, NV 89101 Telephone: (702) 331-7593 Facsimile: (702) 331-1652 Eric P. Early, SBN 166275 (admitted pro hac vice early@earlysullivan.com Diane M. Luczon, SBN 235059 (admitted pro had dluczon@earlysullivan.com EARLY SULLIVAN WRIGHT GIZER & McRAE LLP 6420 Wilshire Boulevard, 17th Floor Los Angeles, California 90048 Telephone: (323) 301-4660 Facsimile: (323) 301-4676 Attorneys for Defendants and Counterclaimants 	
13	UNITED STATES DISTRICT COURT	
14	DISTRICT OF NEVADA	
15		
16	LEON MARK KIZER,	Case No.: 3:15-cv-00120-RCJ-WGC
17	Plaintiff,	[Honorable Robert C. Jones]
18	vs.	STIPULATION AND ORDER TO
19	PTP, INC., et al,	EXTEND THE DEADLINE FOR EXCHANGE OF INITIAL DISCLOSURES
20	Defendants.	[First Request]
21		
22		
23		
24	AND RELATED COUNTERCLAIMS	
25		
26		
27		
EARLY 28 SULLIVAN WRIGHT GIZER & MCRAE LLP ATTORNEYS AT LAW	STIPULATION AND [PROPOS DEADLINE FOR EXCHANG	ED] ORDER TO EXTEND THE E OF INITIAL DISCLOSURES 1310

131026.1

1	STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR		
2	EXCHANGE OF INITIAL DISCLOSURES		
3	FIRST REQUEST		
4	On January 27, 2016, the Court entered the Scheduling Order for the above-entitled action		
5	[Docket Number 368]. Pursuant to the Scheduling Order, the Parties were to exchange initial		
6	disclosures by March 22, 2016.		
7	Now, the parties, by and through their respective counsel, have agreed and hereby		
8	stipulate that the deadline to exchange initial disclosures is extended to April 21, 2016. This		
9	extension is necessary because the Parties require additional time to gather information and		
10	documents in order to exchange their respective initial disclosures.		
11			
12	Dated this 16th day of March, 2016.		
13	LEMONS, GRUNDY & EISENBERG EARLY, SULLIVAN, WRIGHT		
14	GIZER & McRAE, LLP		
15			
16	By: <u>/s/ Douglas R. Brown</u> By: <u>/s/ Diane M. Luczon</u>		
17	DOUGLAS R. BROWN (#7620) RICHARD G. VERLANDER (#12887)SCOTT E. GIZER (NSB #12216) ERIC P. EARLY (pro hac vice)		
18	6005 Plumas Street, Suite 300DIANE M. LUCZON (pro hac vice)		
19	Reno, Nevada 89519 601 South Seventh Street, 2nd Floor (775) 786-6868 Las Vegas, NV 89101		
20	(323) 301-4660		
21			
22	By:/s/ Marni Rubin WatkinsBy:/s/ Kelly R. ChaseMARNI RUBIN WATKINS (#9674)KELLY R. CHASE (#937)		
23	2450 St. Rose Parkway, Suite 100P.O. Box 2800		
24	Henderson, Nevada 89074Minden, Nevada 89423(702) 667-3000(775) 782-3099		
25			
26	///		
27	///		
EARLY 28 SULLIVAN WRIGHT	1		
GIZER & MCRAE LLP ATTORNEYS AT LAW	STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE FOR EXCHANGE OF INITIAL DISCLOSURES 131026.1		

ШGМ

1	J.M. Clouser & Associates, Ltd. 1512 US Hwy 395 North, Suite 1	Dyer, Lawrence, Flaherty, Donaldson & Prunty
2	Gardnerville, Nevada 89410 (775) 782-2888	2805 Mountain Street Carson City, Nevada 89703
3	(113) 102 2000	(775) 885-1896
4		
5	By: <u>/s/ Justin M. Clouser</u> Justin M. Clouser, Esq.	By: <u>/s/ Francis C. Flaherty</u> Francis C. Flaherty, Esq.
6	Justin M. Ciouser, Esq.	Trancis C. Trancity, Esq.
7	Allison, MacKenzie, Pavlakis	
8		
9	By: <u>/s/ Joan C. Wright</u>	
10	Joan C. Wright, Esq. 402 North Division Street	
11	P. O. Box 646 Carson City, Nevada 89702	
12	(775) 687-0202	
13		
14		
15		
16		
17		S SO ORDERED:
18	h	Julian G. Cobb
19	UNI	TED STATES MAGISTRATE JUDGE TED: March 18, 2016.
20		LD. Match 16, 2010.
21		
22		
23		
24		
25		
26		
27		
Early 28 Sullivan	2	
WRIGHT GIZER & MCRAE LLP ATTORNEYS AT LAW		ED] ORDER TO EXTEND THE E OF INITIAL DISCLOSURES