

1 ERIC W. SWANIS, ESQ.  
 Nevada Bar No. 6840  
 2 STEPHANIE D. BEDKER, ESQ.  
 Nevada Bar No. 14169  
 3 GREENBERG TRAUIG, LLP  
 4 3773 Howard Hughes Parkway,  
 Suite 400 North  
 5 Las Vegas, NV 89169  
 Telephone: (702) 792-3773  
 6 Facsimile: (702) 792-9002  
 7 Email: swanise@gtlaw.com  
 bedkers@gtlaw.com

8  
 9 *Counsel for Defendant*  
*Enterprise Leasing Company-West, LLC*

10  
 11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**

14 ROBERT M. GOGGIN,  
 15  
 Plaintiff,  
 16  
 vs.  
 17  
 ENTERPRISE LEASING COMPANY-WEST,  
 18 LLC, a Delaware Corporation; ABC  
 CORPORATIONS I-X, inclusive, BLACK AND  
 19 WHITE COMPANIES, and DOES I-XX,  
 20 inclusive,  
 21  
 Defendants.

Case No.: 3:17-cv-00262-HDM-VPC

**[PROPOSED] ORDER GRANTING  
 PERMISSION TO TAKE DEPOSITION  
 OF JAMES S. PROCTOR**

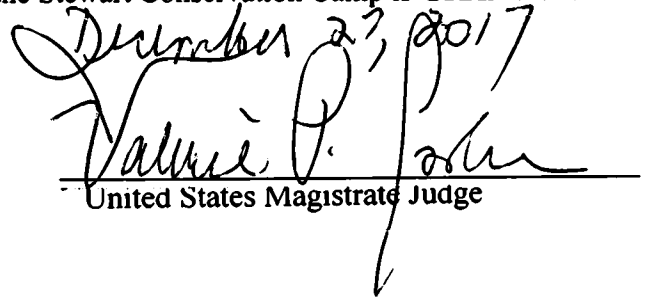
22  
 23 On November 17, 2017, Plaintiff, Robert M. Goggin (“Plaintiff”), and Defendant, Enterprise  
 24 Leasing Company-West, LLC (“Enterprise”) (collectively, the “Parties”), presented before the  
 25 Court at a Case Management Conference (“CMC”) in the instant action. Plaintiff appeared by and  
 26 through his counsel of record, William C. Jeanney, of the law firm Bradley, Drendel & Jeanney.  
 27 Enterprise appeared by and through its counsel of record, Eric W. Swanis, of the law firm  
 28 Greenberg Traurig, LLP.

1 During the CMC, Enterprise requested the Court's permission to take the deposition of the  
2 witness, James S. Proctor, who is currently incarcerated at the Stewart Conservation Camp in  
3 Carson City, Nevada, pursuant to Fed. R. Civ. P. 30(a)(2)(B).<sup>1</sup>

4 This Court, having considered the papers and pleadings on file, the oral arguments of  
5 counsel, and for good cause appearing,

6 **IT IS HEREBY ORDERED** that Enterprise's request for permission to take the deposition  
7 of James S. Proctor (Offender ID: 1043379) at the Stewart Conservation Camp is **GRANTED**.

8 **IT IS SO ORDERED.**

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
  
United States Magistrate Judge

14 *Respectfully submitted by:*

15 GREENBERG TRAURIG, LLP

17 /s/ Eric W. Swanis

18 ERIC W. SWANIS, ESQ.

18 Nevada Bar No. 6840

19 STEPHANIE D. BEDKER, ESQ.

19 Nevada Bar No. 14169

20 3773 Howard Hughes Pkwy., Suite 400N

20 Las Vegas, NV 89169

21 *Counsel for Defendant*

21 *Enterprise Leasing Company-West, LLC*

27 <sup>1</sup> "A party must obtain leave of court, and the court must grant leave to the extent consistent with Rule 26(b)(1) and  
28 (2)...if the deponent is confined in prison."

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on December 19, 2017, a copy of the foregoing **[PROPOSED] ORDER GRANTING PERMISSION TO TAKE DEPOSITION OF JAMES S. PROCTOR** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF filing system, and parties may access this filing through the Court's CM/ECF system.

*/s/ Joyce Heilich*  
An employee of GREENBERG TRAURIG, LLP

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28