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Defendants.

1. Discovery shall be held in abeyance until disposition of the Motion to Dismiss; thereafter, Discovery shall be conducted as follows:

2. Discovery shall be completed within 180 from the date of the ruling on the Motion to Dismiss filed by Defendants. (LR 26-1(e)(1)).
3. Motions to amend, or to add parties, shall be filed and served 90 days prior to the discovery deadline. (LR 26-1(e)(2)).
4. Expert disclosures pursuant to Fed.R. Civ.P. 26(a)(2) shall be made 60 days prior to the discovery deadline. (LR 26-1(c)(3)).
5. Rebuttal expert disclosures shall be made 30 days after the initial disclosure of experts. (LR 26-1(e)(3)).
6. Dispositive motion shall be filed and served on or before 30 days after the discovery deadline. (LR 26-1(e)(4)).
7. The Joint Pre-Trial Order shall be filed -on or before 30 days after the date set for the filing of dispositive motion. In the event dispositive motions are filed, the date for filing the Joint Pre-Trial Order shall be suspended until 30 days after the decision on the dispositive motions or further Order of the Court. (LR 26-1(e)(5)).
8. The interim status report shall be filed by the parties 60 days prior to the discovery deadline. (LR 26-4).

#### **INITIAL DISCLOSURE AND DISCOVERY**

The parties do not require any changes to be made in the timing, form, or requirement for disclosures under Fed.R.Civ.P. Rule 26(a). (Fed.R.Civ.P. Rule 26(f)(3)(A)-).

The parties anticipate conducting written discovery and depositions on all issues identified in the pleadings. Discovery will be limited to those issues identified in the pleadings. (Fed.R.Civ.P. Rule 26(f)(3)(B) ).

1           There are currently no issues which parties are aware of regarding discovery of  
2 electronically stored information or claims of privilege/protection of trial preparations materials.  
3 (Fed.R.Civ.P. Rule 26(f)(3)(C-D) ).

4           There are currently no changes which should be made in the limitations on discovery  
5 imposed by the federal or local rules of practice and no additional orders that this Court should  
6 issue at this time. (Fed.R.Civ.P. Rule 26(f)(3)(E-F).

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8 Dated this 17<sup>th</sup> day of October, 2013

9 THORNDAL, ARMSTRONG, DELK,  
10 BALKENBUSH & EISINGER

LAW OFFICES OF SIGAL CHATTAH

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing was served on the 14th day of October, 2013 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

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/S/ CHATTAH  
An employee of the Law Offices of Sigal Chattah