1 2 3 4 5 6 7	SIGAL CHATTAH, ESQ. Nevada State Bar No.: 8264 LAW OFFICES OF SIGAL CHATTAH, ESQ. 5875 S. Rainbow Blvd., Ste. 204 Las Vegas, Nevada 89118 Tel: (702) 360-6200 Fax: (702) 643-6292 Chattahlaw@gmail.com Attorney for Plaintiff Chad Elie UNITED STATES DISTE	
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10 11	CHAD ELIE	CASE NO.: 213-cv-00888-JCM-VCF
12	Plaintiff, vs.	PROPOSED JOINT DISCOVERY PLAN AND SCHEDULING ORDER
13 14 15	IFRAH PLLC, a Professional Limited Liability Company, ALAIN JEFFERY IFRAH a/k/a JEFF IFRAH, individually, DOE individuals I through XX, and ROE CORPORATIONS I through XX,	SUBMITTED IN COMPLIANCE WITH FED. R. CIV. P.26(f) AND LOCAL RULE 26-1(E)
16	Defendants.	
17 18	The parties hereto, by and through their undersi	gned counsel, herewith submit their joint
19	proposed Discovery Plan and Scheduling Order, pursuant to Fed. R. Civ. P. 26(f) and Local Rule	
20 21	26-1(e).	
22	PROPOSED SCHEDULE	
23	1. Discovery shall be held in abeyance until disposition of the Motion to Dismiss;	
24	thereafter, Discovery shall be conducted as follows:	
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- 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).		
7			
8	Dated this 17 th day of October, 2013		
9	THORNDAL, ARMSTRONG, DELK,	LAW OFFICES OF SIGAL CHATTAH	
10	BALKENBUSH & EISINGER		
11	/s/ B. Terry BRIAN K. TERRY, ESQ.	/s/S. /Chattah SIGAL CHATTAH, ESQ.	
12	Nevada Bar No. 3171 1100 Bridger Avenue	Nevada Bar No.: 8264 5875 S. Rainbow Blvd. #204	
13	Las Vegas, Nevada 89101 Attorneys for Defendants	Las Vegas, Nevada 89118 Attorney for Plaintiff	
14	Ifrah, PLLC, et al.	Chad Elie	
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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. Brian K. Terry, Esq. THORNDAL, ARMSTRONG, DELK BALKENBUSH & EISINGER 1100 E. Bridger Avenue Las Vegas, Nevada 89101 Fax: (702) 366-0327 /S/ CHATTAH_ An employee of the Law Offices of Sigal Chattah