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10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 MARGARET G. SEASTRAND,
13 Plaintiff,

14 vs.

15 RAYMOND RIAD KHOURY; DOES 1
16 through 10; and ROE ENTITIES 11 through
20, inclusive,

17 Defendants.

CASE NO. A-11-636515-C
DEPT NO. XXX

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES PURSUANT TO
EDCR 2.35**

(Second Request)

18 Plaintiff MARGARET G. SEASTRAND, by and through her counsel of record Richard
19 Harris, Esq., Allison Brasier, Esq. and the Richard Harris Law Firm, and Defendant RAYMOND RIAD
20 KHOURY, by and through his counsel of record Steven Jaffe, Esq., Jacob Smith, Esq. and Hall Jaffe &
21 Clayton, LLP, and pursuant to EDCR 2.35, hereby stipulate and agree to and jointly move this
22 Honorable Court for an order continued the discovery deadlines in this matter for forty-five (45) days as
23 follows:

24 **A. Discovery Completed:**

- 25 1. Plaintiff and Defendant have exchanged initial documents and witness lists
26 pursuant to NRCP 16.1;
27 2. Defendant has produced seven (7) supplemental NRCP 16.1 disclosures;
28 3. Defendant has propounded written discovery on Plaintiff, to which Plaintiff has

1 responded;

2 4. Plaintiff has propounded written discovery on Defendant, to which Defendant has
3 responded;

4 5. Defendant has requested and obtained a majority of the Plaintiff's medical records
5 allegedly relating to the incident.

6 6. Plaintiff, Margaret Seastrand, has been deposed.

7 7. Plaintiff's spouse, Douglas Seastrand, has been deposed.

8 8. The Parties and their respective experts have conducted an inspection of both
9 vehicles involved in the subject accident;

10 **B. Discovery that Remains to be Completed:**

11 1. The Deposition of the Officers who completed the Traffic Accident Report
12 (currently scheduled for July 30, 2012);

13 2. Deposition of Defendant need to be taken (currently in the process of being
14 scheduled);

15 3. Further written discovery to and from Plaintiff and Defendants;

16 4. Depositions of Plaintiff's before/after witnesses;

17 5. Depositions of Plaintiff's treating doctors;

18 6. Initial and Rebuttal expert disclosures by all parties;

19 7. The depositions of expert witnesses need to be conducted;

20 8. Additional discovery as needed upon completion of depositions.

21 **C. Reasons that Discovery has not yet been Completed:**

22 As Plaintiff has undergone numerous surgical procedures since the subject accident, her
23 medical records are extremely voluminous. It has taken Defendant longer than expected to procure all
24 of the medical records necessary to conduct her deposition and retain experts.

25 In addition, Plaintiff is making a claim for lost wages and/or loss of earning potential. In
26 response to Defendants' discovery requests, Plaintiff recently disclosed over 1,700 pages of financial
27 documents from her business, Hollywood Kids Academy. Defendants and Plaintiffs need sufficient time
28 to review these documents and have their respective experts review these documents prior to the

1 deadline for disclosure of initial experts.

2 In light of this, the parties have agreed that the current discovery deadlines are
3 insufficient and will not provide adequate time to conduct discovery and prepare this case for trial. The
4 parties are requesting a forty-five (45) day extension on all the discovery deadlines.

5 **D. Current Schedule for Completing Discovery:**

6 Motion to Amend or Add Parties Deadline: 07/13/12

7 Initial Expert Disclosure: 07/13/12

8 Rebuttal Expert Disclosure: 08/13/12

9 Close of Discovery: 09/13/12

10 Dispositive Motion Deadline: 10/15/12

11 **E. Proposed Schedule for Completing Discovery:**

12 Motion to Amend or Add Parties Deadline: 08/30/12

13 Initial Expert Disclosure: 08/30/12

14 Rebuttal Expert Disclosure: 10/01/12

15 Close of Discovery: 11/01/12

16 Dispositive Motion Deadline: 12/03/12

17 **F. Current Trial Date:**

18 The trial in this matter is currently scheduled for a jury trial on November 13, 2012 on a
19 5-week stack. The calendar call is scheduled for November 5, 2012. The parties request that the trial
20 date be vacated, and re-calendared on the next available trial date after January 3, 2013.

21 DATED this 12 day of July, 2012.

DATED this 12 day of July, 2012

22 RICHARD HARRIS LAW FIRM

HALL JAFFE & CLAYTON, LLP

23 By: 

By: 

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Attorneys for Defendant

**ORDER EXTENDING DISCOVERY DEADLINES AND AMENDING THE
SCHEDULING ORDER (EDCR 2.35) (FIRST REQUEST)**

IT IS HEREBY ORDERED that the discovery deadlines are extended as follows:

Motion to Amend or Add Parties Deadline: 08/30/12

Initial Expert Disclosure: 08/30/12

Rebuttal Expert Disclosure: 10/01/12

Close of Discovery: 11/01/12

Dispositive Motion Deadline: 12/03/12

IT IS FURTHER ORDERED that an amended scheduling order will not be issued; this
Stipulation will take the place of the amended scheduling order.

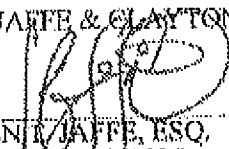
IT IS FURTHER ORDERED that the trial date of November 13, 2012 will be vacated,
and a new trial date will be issued for the first available trial date after January 8, 2013.


DATED: July 13, 2012


DISCOVERY COMMISSIONER

Submitted by:

HALL JAFFE & CLAYTON, LLP

By 
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TRIAL DATE TO BE SET
ON OR AFTER 1-14-13 

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 RAYMOND RIAD KHOURY,
4 APPELLANT,
5 VS.
6 MARGARET SEASTRAND,
7 RESPONDENT.

Case Nos. 64702
65007
65172

Electronically Filed
(Consolidated)
May 28 2015 03:08 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

8 Appeal from the Eighth Judicial District Court of the State of Nevada,
9 in and for the County of Clark,
10 The Honorable Jerry Wiese, District Court Judge,
11 District Court Case No. A-11-636515-C

12 **RESPONDENT'S APPENDIX**

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**ALPHABETICAL INDEX
TO RESPONDENT'S APPENDIX**

1	
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3	Stipulation and Order to Extend Discovery Deadlines
4	Pursuant to EDCR 2.35 (07/24/12) 001
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