

IN THE SUPREME COURT OF THE STATE OF NEVADA

BARRY JAMES RIVES, M.D. and
LAPAROSCOPIC SURGERY OF NEVADA, LLC,

Appellants/Cross-Respondents,
vs.

TITINA FARRIS and PATRICK FARRIS,
Respondents/Cross-Appellants.

No.: 80271

Appeal from the Eighth Judicial District
Court, the Honorable Joanna S. Kishner
Presiding

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Feb 10 2021 05:47 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

BARRY JAMES RIVES, M.D. and
LAPAROSCOPIC SURGERY OF NEVADA, LLC,
Appellants,

vs.

TITINA FARRIS and PATRICK FARRIS,
Respondents.

No.: 81052

Appeal from the Eighth Judicial District
Court, the Honorable Joanna S. Kishner
Presiding

RESPONDENTS/CROSS-APPELLANTS' APPENDIX, VOLUME 2
(Nos. 166–185)

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INDEX TO RESPONDENTS/CROSS-APPELLANTS'
ANSWERING APPENDIX

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
Transcript of January 7, 2019 Telephonic Conference (filed 09/24/2019)		Vol. 1–17
Plaintiffs’ Motion to Strike Defendants’ Rebuttal Witnesses Sarah Larsen, R.N., Bruce Adornato, M.D., and Scott Kush, and to Limit the Testimony of Lance Stone, DO and Kim Erlich, M.D., for Giving Improper “Rebuttal” Opinions, on Order Shortening Time (filed 09/19/2019)		Vol. 1, 18–39
Exhibits to Plaintiffs’ Motion to Strike Defendants’ Rebuttal Witnesses		
Exhibit	Document Description	
1	Defendants Barry J. Rives, M.D. and Laparoscopic Surgery of Nevada, LLC’s Rebuttal Disclosure of Expert Witnesses and Reports (served 12/19/2018)	Vol. 1, 40–44
2	Sarah Larsen, R.N., M.S.N., F.N.P., C.L.C.P. Life Care Plan Report (dated 12/19/2018)	Vol. 1, 45–76
3	Scott J. Kush, M.D., JD, MPH Life Expectancy Report of (dated 12/19/2018)	Vol. 1, 77–109
4	Report of Bruce T. Adornato, M.D. (dated 12/18/2018)	Vol. 1, 110–128
5	Lance R. Stone, DO Report (dated 12/19/2018)	Vol. 1, 129–142
6	Kim S. Erlich M.D. Report (dated 11/26/2018)	Vol. 1, 143–158
7	Brian E. Juell M.D., F.A.C.S. Report (dated 12/16/2018)	Vol. 1, 159–162

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
8	Bart J. Carter, M.D., F.A.C.S. Report (dated 12/19/2018)	Vol. 1, 163–165
Minutes of September 26, 2019 Hearing on Plaintiffs’ Motion for Sanctions Under Rule 37 for Defendants’ Intentional Concealment of Defendant Rives’ History of Negligence and Litigation and Motion for Leave to Amend Complaint to Add Claim for Punitive Damages on Order Shortening Time		Vol. 2, 166
Plaintiffs’ Opposition to Defendants’ Motion to Compel the Deposition of Gregg Ripplinger, M.D. and Extend the Close of Discovery (9th Request) on an Order Shortening Time (filed 09/27/2019)		Vol. 2, 167–173
Exhibit to Plaintiffs’ Opposition to Defendants’ Motion to Compel		
Exhibit	Document Description	
1	Notice Vacating the Deposition of Gregg Ripplinger, M.D.	Vol. 2, 174–177
Plaintiffs’ Trial Exhibits List		Vol. 2, 178–185
Plaintiffs’ Trial Exhibits		
Exhibit	Document Description	
1	St. Rose Dominican San Martin Hospital Medical Records and Billing	Vol. 3, 186–355 Vol. 4, 356–505 Vol. 5, 506–655 Vol. 6, 656–818
6	CareMeridian Medical Records and Billing	Vol. 7, 819–845

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
10	Video of Titina Farris taken by Lowell Pender on April 13, 2015 (<i>See</i> Supreme Court Order Granting Motions, dated 11/10/2020, allowing Trial Exhibit 10 to be filed.	
Court's Trial Exhibits List		Vol. 7, 846–848
Court's Trial Exhibits		
Exhibits	Document Description	
1	Statement to Jury from Counsel (dated 10/14/2019)	Vol. 7, 849
2	Proposed Instruction Not Given (dated 10/16/2019)	Vol. 7, 850
3	Juror [Fossile, Badge No. 444] Question (dated 10/17/2019)	Vol. 7, 851
4	Juror [Fossile, Badge No. 444] Question (dated 10/17/2019)	Vol. 7, 852–853
5	Juror Collins [Badge No. 450] Question (dated 10/17/2019)	Vol. 7, 854
6	Verification (dated 10/18/2019)	Vol. 7, 855
7	October 7, 2019 Transcript of Pending Motions	Vol. 7, 856–937
8	Juror [Collins, Badge No. 450] Question (dated 10/21/2019)	Vol. 7, 938
9	Juror No. 9 [Peacock] Question (dated 10/21/2019)	Vol. 7, 939

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
10	Juror [Crenshaw, Badge No. 455] Question (dated 10/21/2019)	Vol. 7, 940–941
11	Juror [Crenshaw, Badge No. 455] Question (dated 10/21/2019)	Vol. 7, 942
12	Juror [Crenshaw, Badge No. 455] Question (dated 10/21/2019)	Vol. 7, 943
13	Insurance Documents (dated 10/21/2019)	Vol. 7, 944–950
14	Juror [Crenshaw, Badge No. 455] Question (dated 10/21/2019)	Vol. 7, 951–952
15	Juror [Crenshaw, Badge No. 455] (dated 10/21/2019)	Vol. 7, 953–954
16	Juror No. 9 [Peacock] Question (dated 10/21/2019)	Vol. 7, 955–956
17	Juror [Root, Badge No. 361] Question (dated 10/21/2019)	Vol. 7, 957–958
18	Juror [Collins, Badge No. 450] Question (dated 10/21/2019)	Vol. 7, 959–960
19	Juror [Root, Badge No. 361] Question (dated 10/22/2019)	Vol. 7, 961
20	Juror [Fossile, Badge No. 444] Question (dated 10/22/2019)	Vol. 7, 962
21	Juror No. 9 [Peacock] Question (dated 10/22/2019)	Vol. 7, 963–964

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
23	Juror No. 9 [Peacock] Question (dated 10/23/2019)	Vol. 7, 965
24	Juror [Crenshaw, Badge No. 455] Question (dated 10/23/2019)	Vol. 7, 966
25	Juror [Crenshaw, Badge No. 455] Question (dated 10/23/2019)	Vol. 7, 967
26	Juror [Root, Badge No. 361] Question (dated 10/23/2019)	Vol. 7, 968
27	Juror [Barrios, Badge No. 366] Question (dated 10/23/2019)	Vol. 7, 969
28	Juror No. 9 [Peacock] Question (dated 10/23/2019)	Vol. 7, 970–971
29	Juror No. 9 [Peacock] Question (dated 10/23/2019)	Vol. 7, 972
30	Juror [Fossile, Badge No. 444] Question (dated 10/23/2019)	Vol. 7, 973
31	Juror No. 9 [Peacock] Question (dated 10/23/2019)	Vol. 7, 974
32	Juror No. 9 [Peacock] Question (dated 10/24/2019)	Vol. 7, 975
33	Juror No. 9 [Peacock] Question (dated 10/24/2019)	Vol. 7, 976

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
34	Juror [Fossile, Badge No. 444] Question (dated 10/24/2019)	Vol. 7, 977
35	Juror [Crenshaw, Badge No. 455] Question (dated 10/24/2019)	Vol. 7, 978
36	Juror [Barrios, Badge No. 366] Question (dated 10/28/2019)	Vol. 7, 979
37	Juror [Thomas, Badge 418] Question (dated 10/28/2019)	Vol. 7, 980
38	Juror No. 9 [Peacock] Question (dated 10/28/2019)	Vol. 7, 981
39	Juror [Collins, Badge No. 450] Question (dated 10/28/2019)	Vol. 7, 982
40	Juror No. 9 [Peacock] Question (dated 10/30/2019)	Vol. 7, 983
41	Juror [Collins, Badge No. 450] Question (dated 10/30/2019)	Vol. 7, 984
42	Juror [Crenshaw, Badge No. 455] Question (dated 10/30/2019)	Vol. 7, 985
43	Juror [Root, Badge No. 361] Question (dated 10/30/2019)	Vol. 7, 986
44	Juror [Crenshaw, Badge No. 455] Question (dated 10/31/2019)	Vol. 7, 987–988

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
45	Juror [Fossile, Badge No. 444] Question (dated 10/31/2019)	Vol. 7, 989
46	Juror No. 9 [Peacock] Question (dated 10/31/2019)	Vol. 7, 990
Minutes of October 7, 2019 Hearing on All Pending Motions; and also addressed the supplemental pleadings filed October 4, 2019 by defense, and non-compliance issues		Vol. 7, 991–992
Minutes of October 14, 2019 Jury Trial – Day 1		Vol. 7, 993–994
Minutes of October 15, 2019 Jury Trial – Day 2		Vol. 7, 995
Minutes of October 16, 2019 Jury Trial – Day 3		Vol. 7, 996–997
Minutes of October 17, 2019 Jury Trial – Day 4		Vol. 7, 998
Minutes of October 18, 2019 Jury Trial – Day 5		Vol. 7, 999
October 18, 2019 Partial Transcript of Jury Trial – Day 5 (Testimony of Michael Hurwitz, M.D.) [filed 11/14/2019]		Vol. 8, 1000–1093
Defendants Barry Rives, M.D.’s and Laparoscopic Surgery of Nevada, LLC’s Opposition to Plaintiffs’ Motion to Strike Defendants’ Trial Briefs on Order Shortening Time (filed 10/21/2019)		Vol. 8, 1094–1098
Minutes of October 21, 2019 Jury Trial – Day 6		Vol. 8, 1099–1100
Minutes of October 22, 2019 Jury Trial – Day 7		Vol. 8, 1101–1102
Minutes of October 22, 2019 Hearing on Plaintiffs’ Motion to Strike Defendants’ Trial Briefs on Order		Vol. 8, 1103
Minutes of October 23, 2019 Jury Trial – Day 8		Vol. 8, 1104–1105

<u>DOCUMENT DESCRIPTION</u>	<u>LOCATION</u>
October 23, 2019 Partial Transcript of Jury Trial – Day 8 (Testimony of Michael Hurwitz, M.D.) (filed 11/14/2019)	Vol. 8, 1106–1153
Notice of Entry of Order on Plaintiffs’ Motion to Strike Defendants’ Fourth and Fifth Supplements to NRCP 16.1 Disclosures (filed 10/23/2019)	Vol. 9, 1154–1158
Minutes of October 24, 2019 Jury Trial – Day 9	Vol. 9, 1159
Minutes of October 28, 2019 Jury Trial – Day 10	Vol. 9, 1160–1161
Minutes of October 29, 2019 Jury Trial – Day 11	Vol. 9, 1162–1163
Minutes of October 30, 2019 Jury Trial – Day 12	Vol. 9, 1164–1165
Minutes of October 31, 2019 Jury Trial – Day 13	Vol. 9, 1166–1167
Minutes of November 1, 2019 Jury Trial – Day 14	Vol. 9, 1168
Second Amended Jury List (filed 11/01/2019)	Vol. 9, 1169
Minutes of November 7, 2019 Hearing on All Pending Motions	Vol. 9, 1170–1171
Minutes of November 13, 2019 Show Cause Hearing	Vol. 9, 1172
Minutes of November 14, 2019 Hearing on Plaintiffs’ Renewed Motion to Strike	Vol. 9, 1173
Plaintiffs’ Verified Memorandum of Costs and Disbursements (filed 11/19/2019)	Vol. 10, 1174–1340 Vol. 11, 1341–1507
Minutes of November 20, 2019 Hearing on Plaintiffs’ Motion for Sanctions	Vol. 12, 1508
Defendants Barry J. Rives, M.D.’s and Laparoscopic Surgery of Nevada, LLC’s Motion to Re-Tax and Settle Plaintiffs’ Costs (filed 11/22/2019)	Vol. 12, 1509–1522

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
Plaintiffs' Opposition to Defendants Barry J. Rives, M.D.'s and Laparoscopic Surgery of Nevada, LLC's Motion to Re-Tax and Settle Plaintiffs' Costs (filed 11/26/2019)		Vol. 12, 1523–1533
Exhibits to Plaintiffs' Opposition to Defendants' Motion to Re-Tax and Settle Plaintiffs' Costs		
Exhibit	Document Description	
1	Judgment on Verdict (filed 11/14/2019)	Vol. 12, 1534–1538
2	Plaintiffs' Verified Memorandum of Costs and Disbursements (filed 11/19/2019)	Vol. 12, 1539–1547
Defendants Barry J. Rives, M.D.'s and Laparoscopic Surgery of Nevada, LLC's Reply to Plaintiffs' Opposition to Motion to Re-Tax and Settle Plaintiffs' Costs (filed 11/27/2019)		Vol. 12, 1548–1557
Minutes of January 7, 2020 hearing on Plaintiffs' Motion for Fees and Costs		Vol. 12, 1558
Plaintiffs' Supplemental Verified Memorandum of Costs and Disbursements (filed 01/21/2020)		Vol. 13, 1559–1685 Vol. 14, 1686–1813 Vol. 15, 1814–1941
Plaintiffs' Supplemental Opposition to Defendants Barry J. Rives, M.D.'s and Laparoscopic Surgery of Nevada, LLC's Motion to Re-Tax and Settle Plaintiffs' Costs (filed 01/21/2020)		Vol. 16, 1942–1956

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
Exhibits to Plaintiffs' Supplemental Opposition to Defendants' Motion to Re-Tax and Settle Plaintiffs' Costs		
Exhibit	Document Description	
1(a)	Dr. Hurwitz's Report, Billing Rate and CV	Vol. 16, 1957–1969
1(b)	Proof of Payment Issued to Dr. Hurwitz Totaling \$11,000.00 for Fees	Vol. 16, 1970–1973
2(a)	Dr. Willer's Report, Billing Rate and CV	Vol. 16, 1974–1991
2(b)	Proof of Payment Issued to Dr. Willer Totaling 17,425.00 for Fees	Vol. 16, 1992–1995
3(a)	Dr. Barchuk's Report, Billing Rate and CV	Vol. 16, 1996–2063
3(b)	Proof of Payment Issued to Dr. Barchuk Totaling \$26,120.00 for Fees	Vol. 16, 2064–2068
4(a)	Dawn Cook's Life Care Plan Report, Billing Rate and CV	Vol. 16, 2069–2104 Vol. 17, 2105–2162
4(b)	Proof of Payment Issued to Dawn Cook Totaling \$17,957.03 for Fees	Vol. 17, 2163–2168
5(a)	Dr. Stein's Report, Billing Rate and CV	Vol. 17, 2169–2179
5(b)	Proof of Payment Issued to Dr. Stein Totaling \$19,710.00 for Fees	Vol. 17, 2180–2185
6	Proof of Payment Issued to Dr. Feingold Totaling \$2,000.00 for Fees	Vol. 17, 2186–2187

<u>DOCUMENT DESCRIPTION</u>		<u>LOCATION</u>
7(a)	Dr. Clauretie's Report, Billing Rate and CV	Vol. 17, 2188–2206
7(b)	Proof of Payment Issued to Dr. Clauretie Totaling \$1,575.00 for Fees	Vol. 17, 2207–2208
8	Plaintiffs' Supplemental Memorandum of Costs and Disbursements (filed 01/21/2020)	Vol. 17, 2209–2267 Vol. 18, 2268–2429 Vol. 19, 2430–2592
Defendants Barry J. Rives, M.D.'s and Laparoscopic Surgery of Nevada, LLC's Supplemental Reply to Plaintiffs' Supplemental Opposition to Motion to Re-Tax and Settle Plaintiffs' Costs (filed 02/03/2020)		Vol. 20, 2593–2603
Minutes of February 11, 2020 Hearing on Defendants Barry J. Rives, M.D.'s and Laparoscopic Surgery of Nevada, LLC's Motion to Re-Tax and Settle Plaintiffs' Costs		Vol. 20, 2604
District Court Docket Case No. A-16-739464-C		Vol. 20, 2605–2614

A-16-739464-C Titina Farris, Plaintiff(s)
vs.
Barry Rives, M.D., Defendant(s)

September 26, 2019 10:00 AM Plaintiffs' Motion for Sanctions Under Rule 37 for Defendants' Intentional Concealment of Defendant Rives' History of Negligence and Litigation and Motion for Leave to Amend Complaint to Add Claim for Punitive Damages on Order Shortening Time

HEARD BY: Kishner, Joanna S.

COURTROOM: RJC Courtroom 12B

COURT CLERK: Botzenhart, Susan

RECORDER: Harrell, Sandra

REPORTER:

PARTIES PRESENT:

Aimee Lea Clark Newberry

Attorney for Defendant

Chad C. Couchot

Attorney for Defendant

Jacob G Leavitt

Attorney for Plaintiff

Kimball Jones

Attorney for Plaintiff

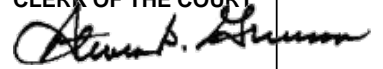
JOURNAL ENTRIES

Arguments by counsel regarding allegations of intentional concealment of defense, deposition of Dr. Rives, and Plaintiff's request for sanctions and punitive damages. Court stated its findings; and offered to set an evidentiary hearing for Dr. Rives to appear. Court noted punitive damages are not appropriate on a sanction basis based on what was provided to the Court at this juncture and applicable case law. Following statements by counsel regarding scheduling, Plaintiff's counsel estimated no more than an hour for the hearing. COURT ORDERED, matter SET for evidentiary hearing. Parties to notify the Court in advance by no later than noon on October 3, 2019, confirming whether or not they want the evidentiary hearing to go forward; and the Court will issue a ruling, if the evidentiary hearing does not go forward. Issues not addressed today may be addressed at time of Calendar Call.

10/07/19 8:30 A.M. EVIDENTIARY HEARING

10/08/19 9:00 A.M. CALENDAR CALL

10/14/19 9:00 A.M. TRIAL BY JURY (MED MAL #1)



OPPS

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DISTRICT COURT

CLARK COUNTY, NEVADA

TITINA FARRIS and PATRICK FARRIS,

Plaintiffs,

vs.

BARRY RIVES, M.D.; LAPAROSCOPIC
SURGERY OF NEVADA, LLC et al.,

Defendants.

CASE NO.: A-16-739464-C

DEPT. NO.: XXXI

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO COMPEL THE
DEPOSITION OF GREGG RIPPLINGER, M.D. AND EXTEND THE CLOSE OF
DISCOVERY (9TH REQUEST) ON AN ORDER SHORTENING TIME**

COMES NOW Plaintiffs PATRICK FARRIS and TITINA FARRIS, by and through their attorneys of record, KIMBALL JONES, ESQ. and JACOB G. LEAVITT, ESQ., with the Law Offices of **BIGHORN LAW** and GEORGE F. HAND, ESQ., with the Law Offices of **HAND & SULLIVAN, LLC**, and hereby submit this Opposition to Defendants' Motion to Compel the

1 Deposition of Gregg Ripplinger, M.D. and Extend the Close of Discovery (9th Request) on an Order
2 Shortening Time.

3 This Opposition is made and based upon all of the pleadings and papers on file herein and the
4 attached Memorandum of Points and Authorities.

5 DATED this 27th day of September, 2019.

6 **BIGHORN LAW**

7 By: /s/ Kimball Jones

8 **KIMBALL JONES, ESQ.**

9 Nevada Bar.: 12982

10 **JACOB G. LEAVITT, ESQ.**

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19 *Attorneys for Plaintiffs*

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1 in this matter—yet no attempt was made until the eve of trial. As there exists no “excusable neglect”
2 for Defendants’ failure to timely depose Dr. Ripplinger, Defendants’ Motion to Compel is properly
3 DENIED.

4 II. LEGAL ARGUMENT & ANALYSIS

5 A. DEFENDANTS HAVE FAILED TO SHOW ANY EXCUSABLE NEGLECT WHICH 6 WOULD JUSTIFY A REOPENING OF DISCOVERY; THEREFORE, DEFENDANTS’ 7 MOTION SHOULD BE DENIED.

8 E.D.C.R. 2.25 states:

9 (a) Every motion... to extend time shall inform the court of any previous extensions
10 granted and state the reasons for the extension requested. **A request for extension made**
11 **after the expiration of the specified period shall not be granted unless the moving**
12 **party, attorney or other person demonstrates that the failure to act was the result of**
13 **excusable neglect.**

14 See E.D.C.R. 2.25(a). (Emphasis added).

15 E.D.C.R. 2.35 states:

16 (a) ...[m]otions to extend any date set by the discovery scheduling order must be in
17 writing and supported by a showing of good cause for the extension and be received by the
18 discovery commissioner within 20 days before the discovery cut-off date or any extension thereof.
19 **A request made beyond the period specified above shall not be granted unless the moving**
20 **party, attorney or other person demonstrates that the failure to act was the result of**
21 **excusable neglect.**

22 See E.D.C.R. 2.35(a). (Emphasis added).

23 The phrase “excusable neglect,” as used in E.D.C.R. 2.35 has not been defined by the Nevada
24 Supreme Court. However, the meaning of the term excusable neglect appears to be well settled. For
25 example, Black’s Law Dictionary defines “excusable neglect” as follows:

26 A failure – which the law will excuse – to take some proper step at the proper time (esp. in
27 neglecting to answer a lawsuit) not because of the party’s own carelessness, inattention, or
28 willful disregard of the court’s process, but because of some unexpected or unavoidable
hindrance or accident or because of reliance on the care and vigilance of the party’s counsel
or on a promise made by the adverse party.

See Black’s Law Dictionary 1133 (9th ed.2009).

1 In *Moseley v. Eighth Judicial Dist. Court ex rel. County of Clark*, 124 Nev. 654, 188 P.3d 1136
2 (2008), the Court found that a party seeking relief under excusable neglect from NRCP 6(b)(2) "...is
3 required to demonstrate that (1) it acted in good faith, (2) it exercised due diligence, (3) there is a
4 reasonable basis for not complying within the specified time, and (4) the nonmoving party will not suffer
5 prejudice. *Id.*, 124 Nev. at 667, 188 P.3d at 1145.
6

7 Defendants' Motion requests this Court to extend a discovery deadline which has already passed
8 without **any** evidence of excusable neglect. Simply put, Defendants failed to notice Dr. Ripplinger's
9 deposition. There is no "excusable neglect" when a party fails to exercise due diligence in deposing
10 witnesses during the proscribed discovery period.
11

12 As Defendants' Motion is void of any arguments of "excusable neglect" and indeed, as
13 Defendants cannot show that there was excusable neglect in their failure to depose Dr. Ripplinger,
14 Defendants' Motion must be DENIED.

15 **B. THE COURT HAS ALREADY REJECTED A REQUEST TO CONTINUE TRIAL IN**
16 **THIS MATTER—DEPOSITIONS CANNOT BE TIMELY CONDUCTED PRIOR TO**
17 **TRIAL.**

18 As Defendants' Motion notes, this Court declined to extend discovery and continue trial in this
19 matter. Defendants cannot timely depose Dr. Ripplinger prior to the trial date in this matter. This fact is
20 made even more forcefully as Defendants have already vacated the deposition of Dr. Ripplinger. There
21 cannot be a re-notification of the deposition at this late juncture prior to the start of trial. As such,
22 Defendants' Motion is properly DENIED.

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1 **III. CONCLUSION**

2 For the foregoing reasons, Plaintiffs respectfully requests that this Court DENY Defendants'
3 Motion to Compel the Deposition of Gregg Ripplinger, M.D. and Extend the Close of Discovery (9th
4 Request) on an Order Shortening Time.

5 DATED this 27th day of September, 2019.

6 **BIGHORN LAW**

7 By: /s/ Kimball Jones

8 **KIMBALL JONES, ESQ.**

9 Nevada Bar.: 12982

10 **JACOB G. LEAVITT, ESQ.**

11 Nevada Bar No.: 12608

12 716 S. Jones Blvd.

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15 Nevada Bar No.: 8483

16 **HAND & SULLIVAN, LLC**

17 3442 N. Buffalo Drive

18 Las Vegas, Nevada 89129

19 *Attorneys for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of
3 **BIGHORN LAW**, and on the 27th day of September, 2019, I served the foregoing ***PLAINTIFFS'***
4 ***OPPOSITION TO DEFENDANTS' MOTION TO COMPEL THE DEPOSITION OF GREGG***
5 ***RIPPLINGER, M.D. AND EXTEND THE CLOSE OF DISCOVERY (9TH REQUEST) ON AN***
6 ***ORDER SHORTENING TIME*** as follows:
7

8 ☒ Electronic Service – By serving a copy thereof through the Court's electronic
9 service system; and/or

10 ☐ U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage
11 prepaid and addressed as listed below:

12 Kim Mandelbaum, Esq.
13 MANDELBAUM ELLERTON & ASSOCIATES
14 2012 Hamilton Lane
15 Las Vegas, Nevada 89106
16 &
17 Thomas J. Doyle, Esq.
18 Chad C. Couchot, Esq.
19 SCHUERING ZIMMERMAN & DOYLE, LLP
20 400 University Avenue
21 Sacramento, California 95825
22 *Attorneys for Defendants*

23
24 /s/ Erickson Finch
25 An employee of **BIGHORN LAW**
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EXHIBIT “1”

[NTVD]
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RIVES, M.D. and LAPAROSCOPIC
SURGERY OF NEVADA, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

TITINA FARRIS and PATRICK FARRIS,)	CASE NO. A-16-739464-C
)	DEPT. NO. 31
Plaintiffs,)	
)	NOTICE VACATING THE DEPOSITION
vs.)	OF GREGG RIPPLINGER, M.D.
)	
BARRY RIVES, M.D.; LAPAROSCOPIC)	
SURGERY OF NEVADA, LLC, et al.,)	
)	
Defendants.)	

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1 TO: ALL INTERESTED PARTIES

2 PLEASE TAKE NOTICE that the deposition of GREGG RIPPLINGER, M.D., scheduled
3 for 8:00 a.m., on the 9th day of October, 2019, at Litigation Services, located at 3770
4 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada, is hereby vacated.

5 Dated: September 23, 2019

6 **SCHUERING ZIMMERMAN & DOYLE, LLP**

7
8 By 

9 CHAD C. COUCHOT
10 Nevada Bar No. 12946
11 400 University Avenue
12 Sacramento, CA 95825-6502
13 (916) 567-0400
14 Attorneys for Defendants BARRY RIVES,
15 M.D. and LAPAROSCOPIC SURGERY OF
16 NEVADA, LLC
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that on the 23rd day of September, 2019, service of a true and correct copy of the foregoing:

NOTICE VACATING THE DEPOSITION OF GREGG RIPPLINGER, M.D.
was served as indicated below:

- ☒ served on all parties electronically pursuant to mandatory NEFCR 4(b);
- ☐ served on all parties electronically pursuant to mandatory NEFCR 4(b) , exhibits to follow by U.S. Mail;
- ☐ by depositing in the United States Mail, first-class postage prepaid, enclosed ;
- ☐ by facsimile transmission; or
- ☐ by personal service as indicated.

Attorney	Representing	Phone/Fax/E-Mail
George F. Hand, Esq. HAND & SULLIVAN, LLC 3442 North Buffalo Drive Las Vegas, NV 89129	Plaintiffs	702/656-5814 Fax: 702/656-9820 hsadmin@handsullivan.com
Kimball Jones, Esq. Jacob G. Leavitt, Esq. BIGHORN LAW 716 S. Jones Boulevard Las Vegas, NV 89107	Plaintiffs	702/333-1111 Kimball@BighornLaw.com Jacob@BighornLaw.com



an employee of Schuering Zimmerman &
Doyle, LLP
1737-10881

EXHIBIT(S) LIST

Case No.: A-16-739464

Trial Date:

10/17/19 - 11/1/19

Dept. No.: **XXXI**

Judge: **JOANNA S. KISHNER**

Court Clerk: Susan Botzenhart

Recorder: **SANDRA HARRELL**

Counsel for Plaintiff: Kimball Jones

Jacob Leavitt, George Hand

Counsel for Defendant: Thomas
Doyle

Titina Farris PLAINTIFF,

vs.

Barry Rives DEFENDANTS.

TRIAL BEFORE THE COURT

Plaintiff'S EXHIBITS (See next page)

[illegible]

TABLE OF CONTENTS – PLAINTIFFS' TRIAL EXHIBITS

**TITINA FARRIS AND PATRICK FARRIS VS. BARRY RIVES, M.D. AND
LAPAROSCOPIC SURGERY OF NEVADA, LLC**

CASE NO.: A-16-739464-C

**PLAINTIFFS' COUNSEL – GEORGE HAND, ESQ.; KIMBALL JONES,
ESQ; AND JACOB LEAVITT, ESQ.**

**DEFENDANTS' COUNSEL – THOMAS J. DOYLE, ESQ. AND KIM
MANDELBAUM, ESQ.**

NO.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ACCEPTED
1.	St. Rose Dominican San Martin Hospital Medical Records and Billing	10-14-19	SKIP	10-14-19
2.	St. Rose Dominican Siena Hospital Billing	RETURNED TO COUNSEL		
3.	Bess Chang, M.D. – Medical Neurology Medical Records and Billing	RETURNED TO COUNSEL		
4.	Elizabeth Hamilton, M.D. Medical Records and Billing	RETURNED TO COUNSEL		
5.	Desert Valley Therapy Medical Records and Billing	RETURNED TO COUNSEL		
6.	CareMeridian Medical Records and Billing	10-22-19	YES	10-22-19
7.	Steinberg Diagnostic Medical Imaging Medical Records and Billing Records	RETURNED TO COUNSEL		
8.	Diagnostic films taken at St. Rose Dominican Hospital Disc	RETURNED TO COUNSEL		
9.	Photographs of Titina Farris	RETURNED TO COUNSEL		
10.	Video of Titina Farris taken by Lowell Pender on April 13, 2015	10-28-19	YES	10-28-19
11.	Videos of Titina Farris, Patrick Farris, Addison Durham, Lowell Pender and Sky Prince	RETURNED TO COUNSEL		
12.	Marriage Certificate	RETURNED TO COUNSEL		
13.	National Vital Statistics Reports United States Life Tables, 2015	RETURNED TO COUNSEL		

14.	Bolton, CF, Neuromuscular Manifestations of Critical Illness, Muscle & Nerve 32: 140-163, 2005	RETURNED TO COUNSEL		
15.	Govindarajan, R, Jones, D, Galvez, N, AANEM Case Study: Critical Illness Polyneuropathy, October 2014	RETURNED TO COUNSEL		
16.	Lacomis, D, Electrophysiology of Neuromuscular Disorders in critical illness, Muscle & Nerve 47:452-463, 2013	RETURNED TO COUNSEL		
17.	Koch, S, et. al., Long-term recovery in critical illness myopathy is complete, contrary to polyneuropathy, Muscle & Nerve 50:431-436	RETURNED TO COUNSEL		
18.	Verena, N., N. Kornmann, Bert van Ramshorst, Anke B.Smits, Thomas L. Bollen, Djamila Boerma, Beware of false-negative CT scan for anastomotic leakage after colonic surgery, International Journal of Colorectal Disease (2014) 29:445-451	RETURNED TO COUNSEL		

EXHIBIT INDEX

DEFENDANTS' TRIAL EXHIBITS

CASE NO. A-16-739464-C

TITINA FARRIS & PATRICK FARRIS

v.

BARRY RIVES, M.D. and LAPAROSCOPIC SURGERY OF NEVADA, LLC

PLAINTIFFS' COUNSEL: Kimball Jones
Jacob Leavitt
George Hamel

DEFENSE COUNSEL: Thomas Doyle

NO.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ADMITTED
A	Portions of medical records from Laparoscopic Surgery of Nevada Bates: A000001 – A-000042	10-30-19	yes RETURNED TO COUNSEL	Not Admitted
B	Medical records from St. Rose Dominican Hospital - San Martin Campus, for the admission on August 7, 2014. Bates: B-000001 – B-000143	RETURNED TO COUNSEL		
C	Medical records from Spring Valley Internal Medicine (Dr. Naomi Chaney). Bates: C-000001 – C-000111	RETURNED TO COUNSEL		
D	Medical records from Advanced Orthopedics and Sports Medicine (Dr. Randall Yee / Dr. Tomman Kuruvilla) Bates: D-000001 – D-000011	RETURNED TO COUNSEL		
E	Imaging Study from St. Rose Dominican Hospital - San Martin Campus- July 5, 2015 CT scan of chest, abdomen, and pelvis	RETURNED TO COUNSEL		
F	Imaging Study from St. Rose Dominican Hospital - San Martin Campus- July 9, 2015 CT scan of chest, abdomen, and pelvis	RETURNED TO COUNSEL		
G	Imaging Study from St. Rose Dominican Hospital - San Martin Campus- July 15, 2015 CT scan of chest, abdomen, and pelvis	RETURNED TO COUNSEL		
H	Imaging Study from St. Rose Dominican Hospital – San Martin Camps – July 4, 2015 (15:51:10) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		

No.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ADMITTED
I	Imaging Study from St. Rose Dominican Hospital – San Martin Camps – July 4, 2015 (15:50:31) – XR Abdomen AP	RETURNED TO COUNSEL		
J	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 4, 2015 (20:04:51) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
K	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 4, 2015 (20:59:58) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
L	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 4, 2015 (20:59:58) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
M	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 6, 2015 (04:02:00) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
N	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 7, 2015 (03:11:25) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
O	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 8, 2015 (03:23:09) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
P	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 7, 2015 (03:11:25) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
Q	Imaging Study from St. Rose Dominican Hospital – San Martin Camps – July 9, 2015 (15:50:31) – XR Abdomen AP+DECUB+OR ERECT	RETURNED TO COUNSEL		
R	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 8, 2015 (20:30:56) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
S	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 10, 2015 (04:25:01) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
T	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 11, 2015 (03:57:39) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		

No.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ADMITTED
U	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 12, 2015 (03:55:06) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
V	Imaging Study from St. Rose Dominican Hospital – San Martin Camps – July 12, 2015 (09:16:42) – XR Abdomen AP+DECUB+OR ERECT	RETURNED TO COUNSEL		
W	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 14, 2015 (03:39:35) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
X	Imaging Study from St. Rose Dominican Hospital – San Martin Camps – July 13, 2015 (11:44:12) – XR Abdomen AP	RETURNED TO COUNSEL		
Y	Imaging Study from St. Rose Dominican Hospital – San Martin Campus – July 15, 2015 (03:30:33) – XR Chest 1 View AP or PA	RETURNED TO COUNSEL		
Z	Imaging Study from Steinberg Diagnostic Medical Imaging Centers – June 12, 2015- CT abdomen	RETURNED TO COUNSEL		
AA	Titina Farris' Responses to Defendants' First Set of Interrogatories Bates: AA-000001 – AA-000012	RETURNED TO COUNSEL		
BB	Patrick Farris' Responses to Defendants' First Set of Interrogatories Bates: BB-000001 – BB-000009	RETURNED TO COUNSEL		
CC	Expert reports by Bart Carter, M.D., P.C. Bates: CC-0000001 – CC-000012	RETURNED TO COUNSEL		
DD	Expert reports by Brian E. Juell, M.D. Bates: DD-000001 – DD-000008	RETURNED TO COUNSEL		
EE	Expert reports by Lance Stone, D.O. Bates: EE-000001 – EE-000006	RETURNED TO COUNSEL		
FF	Expert reports by Sarah Larsen, RN Bates: FF-000001 – FF-000020	RETURNED TO COUNSEL		

No.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ADMITTED
GG	Expert reports by Bruce Adornato, M.D. Bates: GG-000001 – GG-000005	RETURNED TO COUNSEL		
HH	Expert reports by Kim Erlich, M.D. Bates: HH-000001 – HH-000006	RETURNED TO COUNSEL		
II	Expert reports by Scott Kush, M.D. Bates: II-000001 – II-000019	RETURNED TO COUNSEL		
JJ	Expert reports by Erik Volk Bates: JJ-000001 – JJ-000025	RETURNED TO COUNSEL		
KK	Expert Reports by Michael Hurwitz, M.D. Bates: KK-000001 – KK-000008	RETURNED TO COUNSEL		
LL	Expert file of Michael Hurwitz, M.D. Bates: LL-000001 – LL-000028	RETURNED TO COUNSEL		
MM	Expert fee schedule of Michael Hurwitz, M.D.	RETURNED TO COUNSEL		
NN	Expert case list of Michael Hurwitz, M.D.	RETURNED TO COUNSEL		
OO	Expert Reports by Justin Willer, M.D. Bates: OO-000001 – OO-000010	RETURNED TO COUNSEL		
PP	Expert file of Justin Willer, M.D. Bates: PP-000001 – PP-000003	RETURNED TO COUNSEL		
QQ	Expert fee schedule of Justin Willer, M.D.	RETURNED TO COUNSEL		
RR	Expert case list of Justin Willer, M.D.	RETURNED TO COUNSEL		
SS	Expert Reports by Alan J. Stein, M.D. Bates: SS-000001 – SS-000008	RETURNED TO COUNSEL		
TT	Expert fee schedule of Alan J. Stein, M.D.	RETURNED TO COUNSEL		
UU	Expert case list of Alan J. Stein, M.D.	RETURNED TO COUNSEL		

No.	DESCRIPTION	DATE OFFERED	OBJECTION	DATE ADMITTED
VV	Expert Reports by Dawn Cook, R.N. Bates: VV-000001 – VV-000085	RETURNED TO COUNSEL		
WW	Expert file of Dawn Cook, R.N. Bates: WW-000001 – WW-000011	RETURNED TO COUNSEL		
XX	Expert fee schedule of Dawn Cook, R.N.	RETURNED TO COUNSEL		
YY	Expert case list of Dawn Cook, R.N. Bates: YY-000001 – YY-000003	RETURNED TO COUNSEL		
ZZ	Expert Reports by Terrence M. Clauretie Bates: ZZ-000001 – ZZ-000018	RETURNED TO COUNSEL		
AAA	Expert file of Terrence M. Clauretie Bates: AAA-000001 – AAA-000066	RETURNED TO COUNSEL		
BBB	Expert fee schedule of Terrence M. Clauretie	RETURNED TO COUNSEL		
CCC	Expert case list of Terrence M. Clauretie Bates: CCC-000001 – CCC-000024	RETURNED TO COUNSEL		
DDD	Expert Reports by Alex Barchuk, M.D. Bates: DDD-000001 – DDD-000032	RETURNED TO COUNSEL		
EEE	Expert file of Alex Barchuk, M.D. Bates: EEE-000001 – EEE-000060	RETURNED TO COUNSEL		
FFF	Expert fee schedule of Alex Barchuk, M.D.	RETURNED TO COUNSEL		
GGG	Expert case list of Alex Barchuk, M.D. Bates: GGG-000001 – GGG-000010	RETURNED TO COUNSEL		