IN THE SUPREME COURT OF THE STATE OF NEVADA CLARK COUNTY, NEVADA

IRVING TORREMORO; AND KEOLIS TRANSIT SERVICES, LLC,

Petitioners,

vs.
THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE ERIKA D. BALLOU,
DISTRICT JUDGE,

Respondents.

and

LAMONT COMPTON,

Real Party in Interest.

Supreme Court Case Electronically Filed Jan 13 2022 09:59 a.m. District Court Case Elizabeth 2008 Prown Clerk of Supreme Court

APPENDIX TO REAL PARTY IN INTEREST LAMONT COMPTON'S ANSWER TO WRIT

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DATE	DESCRIPTION	VOLUME	PAGES
02/01/2019	Scheduling Order	1	COMPTON000001- COMPTON000002
11/06/19	Stipulation and Order Extending Discovery Deadlines and Continue Trial Date	1	COMPTON000003- COMPTON000005

CERTIFICATE OF SERVICE

I certify that on the 13th day of January 2022 this document was electronically filed with the Nevada Supreme Court. Electronic service of the foregoing: **APPENDIX TO REAL PARTY IN INTEREST LAMONT COMPTON'S ANSWER TO WRIT** shall be made in accordance with the Master Service List as follows:

Michael P. Lowry, Esq.
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
6689 Las Vegas Boulevard, Suite 200
Las Vegas, Nevada 89119
Attorneys for Petitioners Irving Torremoro and Keolis Transit Services, LLC

DATED this 13th day of January 2022.

/s/ Brandon Lopipero

An Employee of Maier Gutierrez & Associates

Steven D. Grierson CLERK OF THE COURT DISTRICT COURT 1 2 CLARK COUNTY, NEVADA 3 LAMONT COMPTON, 4 Plaintiff(s), 5 CASE NO. A-18-777320-C 6 DEPT NO. XXIII 7 KEOLIS TRANSIT SERVICE, LLC, et al., 8 Defendant(s). 9 10 SCHEDULING ORDER 11 NATURE OF ACTION: Personal injury – vehicle accident 12 TIME REQUIRED FOR TRIAL: 3-5 days 13 TRIAL READY DATE: 4/6/20 14 DATES FOR SETTLEMENT CONFERENCE: None requested 15 16 Counsel representing all parties and after consideration by the Discovery Commissioner, 17 IT IS HEREBY ORDERED: 18 all parties shall complete discovery on or before 1/7/20. 1. 19 2. all parties shall file motions to amend pleadings or add parties on or before 10/9/19. 20 3. all parties shall make initial expert disclosures pursuant to N.R.C.P. 16.1(a)(2) on or 21 before 10/9/19. 22 all parties shall make rebuttal expert disclosures pursuant to N.R.C.P. 16.1(a)(2) on or 4. 23 before 11/8/19. 24 all parties shall file dispositive motions on or before 2/6/20. 25 5. 26 Certain dates from your case conference report(s) may have been changed to bring them into 27 compliance with N.R.C.P. 16.1. 28

DISCOVERY COMMISSIONER

EIGHTH JUDICIAL DISTRICT COURT

Electronically Filed 2/1/2019 1:20 PM

1	Within 60 days from the date of this Scheduling Order, the Court shall notify counsel for the			
2	parties as to the date of trial, as well as any further pretrial requirements in addition to those set forth			
3	above.			
4	Unless otherwise directed by the court, all pretrial disclosures pursuant to N.R.C.P. 16.1(a)(3)			
5	must be made at least 30 days before trial.			
6	Motions for extensions of discovery shall be made to the Discovery Commissioner in strict			
7	accordance with E.D.C.R. 2.35. Discovery is completed on the day responses are due or the day a			
8	deposition begins.			
10				
11	Unless otherwise ordered, all discovery disputes (except disputes presented at a pre-trial			
	conference or at trial) must first be heard by the Discovery Commissioner.			
12	Date: February 1, 2019			
13	11			
15	DISCOVERY COMMISSIONER			
16	CERTIFICATE OF SERVICE			
17				
18	I hereby certify that on the date filed, a copy of the foregoing Scheduling Order was electronically served, pursuant to N.E.F.C.R. Rule 9, to all registered parties in the Eighth Judicial District Court Electronic Filing Program.			
19	If indicated below, a copy of the foregoing Scheduling Order was also:			
20				
21	Mailed by United States Postal Service, Postage prepaid, to the proper parties listed below at their last known address(es):			
22				
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24 25	AU_{A}			
26	COMMISSIONER DESIGNEE			
27	COMMODICATING PROTOTOLE			

DISCOVERY
COMMISSIONER
EIGHTH JUDICIAL
DISTRICT COURT

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11/6/2019 11:10 AM
Steven D. Grierson
CLERK OF THE COURT

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Attorneys for Keolis Transit Services, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

LAMONT COMPTON, an individual,

Plaintiff,

VS.

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KEOLIS TRANSIT SERVICES, LLC, a foreign limited liability company; UNKNOWN DRIVER, an individual; DOES I through X; and ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No: A-18-777320-C

Dept. No: 23

Stipulation and Order Extending Discovery Deadlines and Continuing Trial Date

IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, that the current discovery deadlines and trial dates in this matter be extended so that the parties may complete remaining necessary discovery as set forth herein.

Pursuant to EDCR 2.35(b) the parties provide the following in support of this Stipulation and Order.

1. Discovery Completed to Date.

The parties have exchanged their respective NRCP 16.1 disclosures of witnesses and documents and provided supplements thereto.

Defendant Keolis has served Plaintiff with Interrogatories and Requests for Production to which Plaintiff has responded.

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Plaintiff has served Defendant Keolis with Interrogatories, Requests for Admission and Requests for Production, to which Defendant has responded.

On July 15, 2019, Defendant Keolis took the deposition of Plaintiff.

Discovery That Remains To Be Completed.

The parties have yet to make initial expert disclosures or conduct expert discovery.

2. Reasons to Extend the Discovery Deadlines.

Plaintiff has an extensive medical history which has resulted in a large volume of treatment and billing records from numerous providers.

On September 23, 2019, Defendant's expert advised Defendant he will be out of the country for the upcoming weeks and would be unable to review the large volume of treatment and billing records by the expert disclosure deadline.

Based on the foregoing, the parties propose that initial expert disclosures, and associated discovery deadlines be continued an additional sixty (60) days to allow time for Defendant Keolis to make initial expert disclosures.

The parties seek a revised discovery schedule as set forth below.

3. Proposed Schedule for Completing Discovery.

	Current Date	Proposed Date
Last day to add parties/amend pleadings	10/09/2019	12/09/2019
Initial expert disclosures	10/09/2019	12/09/2019
Rebuttal expert disclosures	11/08/2019	01/08/2020
Close of discovery	01/07/2020	03/07/2020
Deadline to file dispositive motions	02/06/2020	04/06/2020
TRIAL	04/20/2020	TBD by court
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1. Conclusion.

Based on the foregoing, the parties respectfully request the court to enter an order on the above stipulation, extending the discovery deadlines and continuing the trial date as set forth above.

JOSEPH A. GUTIERREZ, ESQ. STEPHEN G. CLOUGH, ESQ.

MAIER GUTIERREZ & ASSOCIATES

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Las Vegas, Nevada 89101-6014

Attorneys for Keolis Transit Services, LLC

IT IS SO ORDERED this

_day of

_, 2019.

DISTRICT JUDGE

JUDGE STEFANY A. MILEY

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