

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Autumn White v. Costco Wholesale Corporation

White · No. 2:25-cv-01967-ART-NJK · Decided January 6, 2026

SUMMARY

The United States District Court for the District of Nevada considered the parties’ stipulation to extend case management deadlines by 90 days. The court found that the parties had not shown good cause or sufficient diligence to justify the requested extension, particularly because little discovery had occurred. As a one-time courtesy, the court granted a 30-day extension and reset the case management deadlines.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Nancy J. Koppe
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 6, 2026
DOCKET	2:25-cv-01967-ART-NJK
DISPOSITION	other
PROCEDURAL POSTURE	The parties jointly stipulated to a 90-day extension of case management deadlines under the scheduling order.
STANDARD OF REVIEW	A request to modify scheduling-order deadlines is evaluated under the good-cause standard of Federal Rule of Civil Procedure 16(b)(4), focusing on whether the deadlines could not reasonably be met despite the exercise of diligence.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Autumn White v. Costco Wholesale Corporation

TOPICS

- civil procedure
- discovery dispute

PRACTICE AREAS

- civil procedure
- discovery

QUESTIONS PRESENTED

1. Whether the parties established good cause under Federal Rule of Civil Procedure 16(b)(4) and Local Rule 26-3 to extend the case management deadlines by 90 days.
2. Whether the court should grant a lesser extension despite the parties' failure to demonstrate adequate discovery diligence.

HOLDINGS

1. The parties did not establish good cause for the requested 90-day extension because they failed to show that the deadlines could not reasonably be met despite diligent efforts.
2. The court granted a 30-day extension of the case management deadlines as a one-time courtesy, while denying the requested extension to the extent it sought 90 days.

KEY QUOTATIONS

“The diligence obligation is ongoing.” (at 1)

“When diligence has not been shown in support of an extension request, “the inquiry should end.”” (at 1)

“The stipulation fails to establish good cause for any extension, let alone for an extraordinary extension of 90 days.” (at 2)

“What is absent is any meaningful discussion as to why none of that discovery has taken place in the preceding months.” (at 2)

“Notwithstanding the above, as a one-time courtesy to the parties, the Court will allow a 30-day extension of the case management deadlines.” (at 2)

FACTUAL BACKGROUND

The parties conducted their Rule 26(f) conference months before seeking relief and had a scheduling order in place since October 27, 2025. They had exchanged mandatory initial disclosures but had completed no written discovery or depositions; written discovery served more than two months earlier remained unanswered. The parties attributed the delay generally to holidays, counsel and witness schedules, and discussions of possible early settlement, without explaining why discovery had not proceeded.

PROCEDURAL HISTORY

The parties held their Rule 26(f) conference on September 23, 2025, filed a discovery plan on October 24, 2025, and proceeded under a scheduling order entered October 27, 2025. After little or no affirmative discovery was completed, they sought a 90-day extension of the case management deadlines. The court found that the stipulation did not establish good cause for the requested extension but granted a 30-day extension as a one-time courtesy and denied the request to the extent it sought an additional 60 days.

DISPOSITION

other

CASES CITED

- Desio v. State Farm Mut. Auto. Ins. Co., 339 F.R.D. 632, 641 (D. Nev. 2021)
- Janicki Logging Co. v. Mateer, 42 F.3d 561, 566 (9th Cir. 1994)
- Cornwell v. Electra Cent. Credit Union, 439 F.3d 1018, 1027 (9th Cir. 2006)
- Johnson v. Mammoth Recreations, Inc., 975 F.2d 604, 609 (9th Cir. 1992)
- Morgal v. Maricopa Cnty. Bd. of Supervisors, 284 F.R.D. 452, 460 (D. Ariz. 2012)
- Williams v. James River Grp. Inc., 627 F. Supp. 3d 1172, 1177-78, 1181 (D. Nev. 2022)
- Jackson v. Laureate, Inc., 186 F.R.D. 605, 608 (E.D. Cal. 1999)
- Days Inn Worldwide, Inc. v. Sonia Invs., 237 F.R.D. 395, 399 (N.D. Tex. 2006)

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