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 14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

16 SANDRA K. KRAUSE,
 17 Plaintiff,
 18 vs.
 19 NEVADA MUTUAL INSURANCE
 COMPANY, a Nevada corporation; and TREAT
 20 CORPORATION, a Minnesota corporation;
 21 Defendants.

Case No.: 2:12-cv-00342-JCM-CWH

22 **STIPULATION FOR EXTENSION OF TIME FOR DEFENDANTS' RESPONSES TO**
 23 **PLAINTIFF SANDRA KRAUSE'S MOTIONS FOR LEAVE TO FILE**
 24 **SUPPLEMENTAL AND RECENTLY DISCOVERED EVIDENCE IN RELATION TO**
 25 **BOTH MOTIONS FOR SUMMARY JUDGMENT REGARDING PAY DATA FOR**
ANOTHER TREAT VP (DOC. NOS. 234 AND 235)

26 **(Second Request)**

27 Pursuant to Local Rule 6-1, Plaintiff Sandra Krause ("Plaintiff") and Defendants Nevada
 28 Mutual Insurance Company and Trean Corporation ("Defendants"), by and through their counsel of

1 record, hereby submit the following Stipulation for (a second) Extension of Time for Defendants to
2 respond to Plaintiff Sandra Krause's Motions for Leave to File Supplemental and Recently
3 Discovered Evidence in Relation to Both Motions for Summary Judgment Regarding Pay Data
4 for Another Trean VP (Doc. Nos. 234 and 235) (Plaintiff's "Motions for Leave"), which were
5 filed on February 19, 2015, and they respectfully request the Court grant this second extension for
6 Defendants and subsequent briefing.

7 Plaintiff filed her Motions for Leave on February 19, 2015, which raised the issue of the
8 discovery of a former male employee named Ryan Saul who was employed as a Trean VP and
9 was not included on the compensation chart Defendants produced to Plaintiff and which had
10 subsequently been filed as part of Defendants' pending Renewed Motion for Summary Judgment
11 (Doc. No. 197) and Plaintiff's pending Motion for Partial Summary Judgment (Doc. No. 200).
12 Under Local Rule 7-2, Defendants' response to these Motions for Leave was originally due on
13 Thursday March 5, 2015. On March 4, 2015, Defendants requested and Plaintiff agreed to
14 stipulate to a brief extension of time for Defendants' response to allow Defendants additional
15 time to fully investigate the matter and the disclosures previously made. Plaintiff stipulated to
16 the requested extension as a matter of professional courtesy until March 16, 2015. (Doc. No.
17 236.) On March 6, 2015, the Court granted the parties' stipulation. (Doc. No. 237.)

18 As a result of Plaintiff's Motions for Leave, Defendants and their counsel worked
19 diligently to investigate this matter. As a result of this investigation, Defendants confirmed that
20 Mr. Saul worked for Trean as a vice president for approximately five weeks in 2009 and that Mr.
21 Saul's annualized salary was higher than Plaintiff's annualized salary in 2009, and they informed
22 Plaintiff of the same. In addition, in light of the information uncovered about Mr. Saul,
23 Defendants undertook a further investigation to confirm the accuracy of the information
24 contained on the compensation chart. This investigation revealed other corrections that needed
25 to be made to the compensation chart.

26 In light of these discoveries, Defendants sent an email to Plaintiff's counsel on Friday,
27 March 13, 2015 advising Plaintiff of the same, and Defendants made proposals over the
28 weekend, which Plaintiff was not willing to agree to. The parties have since engaged in multiple

1 correspondence about this matter. To facilitate further discussions, Plaintiff offered to afford a
2 second, modest extension to the current deadlines for Defendants' response to Plaintiff's Motions
3 for Leave and to provide additional time to work out some of the disputed issues. In light of these
4 circumstances, the parties submit that good cause exists to provide another short extension for
5 Defendants' response to Plaintiff's Motions for Leave. No trial date has been set on this matter, and
6 permitting this short extension (of nine days) will allow the parties to carefully analyze the status of
7 the situation and its impact on the pending motions.

8 In light of the above, the parties hereby stipulate to extending the briefing schedule on
9 Plaintiff's Motions for Leave to allow Defendants until Wednesday, March 25, 2015 to file their
10 response to both of Plaintiff's Motions for Leave. The parties have also agreed that Plaintiff shall
11 subsequently have until Friday, April 17, 2015 to file her reply in relation to her Motions for Leave.

12 This stipulation requesting that this extension be allowed is being made pursuant to Local
13 Rule 6-1, is being submitted prior to the expiration of the existing deadline, has been agreed to for
14 all the reasons set forth above, and will not unduly delay the course of these proceedings.

15 Dated: March 16, 2015

Dated: March 16, 2015

16 By: /s/ Kathleen J. England

By: /s/ Tyler P. Brimmer

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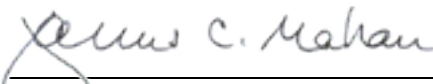
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IT IS SO ORDERED

27 Dated: March 19, 2015



JAMES C. MAHAN
United States District Judge