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10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

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13 DANIEL SMALL, CAROLYN SMALL,  
 WILLIAM CURTIN, DAVID COHEN,  
 14 LANETTE LAWRENCE, and LOUISE  
 COLLARD, Individually, and on Behalf of All  
 15 Other Persons Similarly Situated,

16 Plaintiff,

17 vs.

18 UNIVERSITY MEDICAL CENTER OF  
 SOUTHERN NEVADA;

19 Defendant.  
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CASE NO. 2-13-cv-0298-APG - PAL

**STIPULATION TO STAY DISCOVERY  
 PENDING MAGISTRATE JUDGE  
 LEEN’S DECISION ON DEFENDANT’S  
 OBJECTION TO SPECIAL MASTER  
 REPORT AND RECOMMENDATION**

21 Plaintiffs DANIEL SMALL, CAROLYN SMALL, WILLIAM CURTIN, DAVID  
 22 COHEN, LANETTE LAWRENCE, and LOUISE COLLARD (hereinafter collectively referred to  
 23 herein as “Plaintiffs”) and Defendant UNIVERSITY MEDICAL CENTER OF SOUTHERN  
 24 NEVADA (hereinafter referred to as “Defendant”), by and through their respective counsel of  
 25 record, hereby stipulate and agree as follows:

26 On August 18, 2014, Special Master Daniel Garrie filed his Report and Recommendation  
 27 and Findings of Fact and Conclusions of Law regarding electronic discovery issues in this matter.

28 *See Dkt. No. 189.*

1 On September 2, 2014, Defendant filed its Objection to Special Master Garrie's Report and  
2 Recommendation. *See Dkt. No. 207.*

3 The Court heard argument on Defendant's Objection approximately seven months ago, on  
4 October 21, 2014, and took this matter under advisement. *See Dkt. No. 228.* The Court has not yet  
5 issued its written order.

6 Following the parties unsuccessful attempt to resolve this litigation through mediation, on  
7 April 22, 2015, Defendant served written discovery requests on 102 opt-in plaintiffs.

8 The Special Master Report and Recommendation recommends certain dispositive  
9 sanctions which will impact the scope and needs of discovery in this matter.

10 Therefore, the parties hereby stipulate and agree that all discovery in this matter should be  
11 stayed pending a decision by Magistrate Judge Leen on Defendant's Objection to Special Master  
12 Report and Recommendation [Dkt. No. 207]. This stipulation is made pursuant to LR 7-1. Good

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1 cause exists for such a stay as the pending Objection touches on dispositive issues. *See Data Disc.,*  
2 *Inc. v. Sys. Tech. Assoc., Inc.*, 557 F.2d 1280, 1285 (9th Cir. 1977) (concerning the courts' broad  
3 discretion to stay discovery pending disposition of dispositive filings).

4 IT IS SO STIPULATED:

5 DATED: May 22, 2015

6 LEWIS BRISBOIS BISGAARD & SMITH LLP GLANCY PRONGAY & MURRAY LLP  
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8 By: /s/ Robert W. Freeman  
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22 **ORDER**

23 Upon stipulation of the aforementioned parties, and good cause appearing,

24 **IT IS HEREBY ORDERED** that discovery in this action be stayed, pending resolution of  
25 Defendant's Objection to the Special Master Report and Recommendation [Dkt. No. 207].

26 DATED this 2nd day of June, 2015.

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28 U.S. MAGISTRATE JUDGE