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8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

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

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

**STIPULATION AND [PROPOSED]  
 ORDER TO STAY AND PROPOSED  
 BRIEFING SCHEDULE**

14 Plaintiffs,

15 vs.

16 UNIVERSITY MEDICAL CENTER OF  
 SOUTHERN NEVADA; a political  
 17 subdivision of Clark County, State of Nevada,  
 CLARK COUNTY, a political subdivision of  
 18 the State of Nevada, and JOHN ESPINOZA,  
 an individual.

19 Defendants.  
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21 IT IS HEREBY STIPULATED AND AGREED BETWEEN Plaintiffs DANIEL SMALL,  
 22 CAROLYN SMALL, WILLIAM CURTIN, DAVID COHEN, LANETTE LAWRENCE, and  
 23 LOUISE COLLARD, and Defendants UNIVERSITY MEDICAL CENTER OF SOUTHERN  
 24 NEVADA and JOHN ESPINOZA (collectively referred to as “the Parties”) by and through their  
 25 respective counsel, as follows:

26 On October 30, 2018, the Court granted the Parties’ Stipulation to Extend Briefing  
 27 Schedule regarding the Parties’ Responses to the pending Motions for Summary Judgment. (ECF

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1 No. 346). Pursuant to such, the deadline to file Responses was extended to December 4, 2018.  
2 (Id.)

3 On November 5, 2018, Magistrate Leen granted Plaintiffs' Revised Application for Costs  
4 and Attorneys' Fees. (ECF No. 347). Pursuant to such, Magistrate Leen ordered UMC to pay  
5 Plaintiffs' attorneys' fees and costs by December 5, 2018. (Id.) The deadline to file an Objection  
6 to the Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees is November  
7 19, 2018.

8 The Parties are engaged in settlement negotiations. To facilitate continued settlement  
9 negotiations, the Parties hereby stipulate and agree that this matter be stayed for all purposes for  
10 sixty (60) days.

11 The Parties further stipulate and agree that upon the expiration of sixty (60) days, the  
12 Parties' shall have twenty-one (21) days to file Responses to the pending Motions for Summary  
13 Judgment.

14 The Parties further stipulate and agree that UMC shall have until December 3, 2018, to file  
15 an Objection to the Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.  
16 (ECF No. 347). Plaintiffs shall have fourteen (14) days upon the expiration of the sixty (60) day  
17 stay to file a response to UMC's Objection to the Order granting Plaintiffs' Revised Application  
18 for Costs and Attorneys' Fees.

19 Counsel for the Parties have met and conferred regarding an agreed stay; met and  
20 conferred regarding an extension of the briefing schedule for the Parties' Responses; and, met and  
21 conferred regarding an extension of the deadline to file an Objection to the Magistrate's Order  
22 granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.

23 THEREFORE, the Parties hereby respectfully stipulate and request:

- 24 1. That this matter be stayed sixty (60) days for all purposes.
- 25 2. That upon the expiration of sixty (60) days, the Parties' shall have twenty-one (21)  
26 days to file Responses to the pending Motions for Summary Judgment.
- 27 3. That UMC shall have an extension to December 3, 2018, to file an Objection to the  
28 Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.

1           4.       Plaintiffs shall have fourteen (14) days upon the expiration of sixty (60) day stay to  
2 file a response to UMC's Objection to the Order granting Plaintiffs' Revised Application for Costs  
3 and Attorneys' Fees.

4           IT IS SO STIPULATED.

5 DATED this 16th day of November, 2018.

DATED this 16th day of November, 2018.

6     *Marc Godino*

    *Danielle C. Miller*

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IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
Dated: November 20, 2018.