

1 WENDY MEDURA KRINCEK, ESQ., Bar # 6417
 2 MARCUS B. SMITH, ESQ., Bar # 12098
 3 LITTLER MENDELSON, P.C.
 3960 Howard Hughes Parkway, Suite 300
 4 Las Vegas, NV 89169-5937
 Telephone: 702.862.8800
 5 Fax No.: 702.862.8811
 E-mail: wkrincek@littler.com
mbsmith@littler.com

6 Attorneys for Defendant
 7 RAEJOHNE FOSTER

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

11 ANGELA CUMMINGS,
 12 Plaintiff,

13 vs.

14 VALLEY HEALTH SYSTEM, LLC, a
 15 Delaware Limited-Liability Company d/b/a
 16 DESERT SPRINGS HOSPITAL;
 RAEJOHNE FOSTER, an individual,
 17 Defendants.

CASE NO. 2:13-CV-00479-APG-GWF

**STIPULATION TO EXTEND TIME TO
 FILE JOINT PRETRIAL ORDER**

[SECOND REQUEST]

19 Plaintiff, ANGELA CUMMINGS, and Defendant, RAEJOHNE FOSTER, the sole
 20 remaining defendant, by and through their respective counsel of record, hereby stipulate and agree to
 21 extend the current deadline to file a Joint Pretrial Order from December 4, 2017, (*see* ECF No. 109),
 22 up to and including **January 8, 2018**.

23 Good cause and excusable neglect exist for the requested extension. Specifically, the parties
 24 recently attempted to settle this matter at a settlement conference. (*See* ECF No. 110). Though no
 25 settlement was reached, the parties have directed their time and resources to achieving a resolution to
 26 this matter. Due to the impending holiday schedule, and the parties' continued efforts to resolve this
 27 case, the parties believe a reasonable extension of time to submit the Joint Pretrial Order
 28 is warranted. The parties therefore request an extension up to and including **January 8, 2018**.

1 This is the second request for an extension of this deadline and it is sought in good faith and
2 not for the purpose of delay.

3 Dated: November 29, 2017

Dated: November 29, 2017

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ James P. Kemp

JAMES P. KEMP, ESQ.
KEMP & KEMP, ATTORNEYS AT LAW

/s/ Marcus B. Smith

WENDY MEDURA KRINCEK, ESQ.
MARCUS B. SMITH, ESQ.
LITTLER MENDELSON, P.C.

8 Attorney for Plaintiff

Attorneys for Defendants

10 **ORDER**

11 **IT IS SO ORDERED.**

12 Dated this 30th day of November, 2017.

13
14
15 
16 UNITED STATES MAGISTRATE JUDGE

17
18 Firmwide:151470007.1 069080.1036