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Attorneys for Defendant
RAEJOHNE FOSTER

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANGELA CUMMINGS,

Plaintiff,

VS.

VALLEY HEALTH SYSTEM, LLC, a
Delaware Limited-Liability Company d/b/a
DESERT SPRINGS HOSPITAL;
RAEJOHNE FOSTER, an individual,

Defendants.

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

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

[SECOND REQUEST]

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

Good cause and excusable neglect exist for the requested extension. Specifically, the parties recently attempted to settle this matter at a settlement conference. (See ECF No. 110). Though no settlement was reached, the parties have directed their time and resources to achieving a resolution to this matter. Due to the impending holiday schedule, and the parties' continued efforts to resolve this case, the parties believe a reasonable extension of time to submit the Joint Pretrial Order 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

4 Respectfully submitted,

6 */s/ James P. Kemp*

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

8 Attorney for Plaintiff

1 Dated: November 29, 2017

2 Respectfully submitted,

6 */s/ Marcus B. Smith*

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

8 Attorneys for Defendants

10 **ORDER**

11 **IT IS SO ORDERED.**

12 Dated this 30th day of November, 2017.

15 
16 UNITED STATES MAGISTRATE JUDGE

18 Firmwide:151470007.1 069080.1036