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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 ANGELA CUMMINGS,

Plaintiff,

9 vs.

10 UNITED HEALTHCARE SERVICES, INC., a
 Delaware Corporation; UHS OF DELAWARE,
 11 INC., a Delaware Corporation; VALLEY
 12 HEALTH SYSTEM, LLC, a Delaware Limited-
 Liability Company d/b/a DESERT SPRINGS
 13 HOSPITAL; RAEJOHNE FOSTER, an
 14 individual,

Defendants.

Case No.: 2:13-cv-479-APG-GWF

**STIPULATION AND ORDER TO
 EXTEND TIME FOR PLAINTIFF TO
 RESPOND TO DEFENDANTS'
 MOTION FOR SUMMARY JUDGMENT
 AND FOR DEFENDANTS TO RESPOND
 TO PLAINTIFF'S MOTION FOR
 PARTIAL SUMMARY JUDGMENT**

[FIRST REQUEST]

15 STIPULATION

16 It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff,
 17 ANGELA CUMMINGS, (hereinafter referred to as "Plaintiff"), shall have an extension from
 18 Thursday, April 30, 2015 to and including Monday, May 11, 2015, in which to file her Response to
 19 Defendants' Motion for Summary Judgment filed April 6, 2015. Additionally, the Defendants shall
 20 have an extension through and including May 20, 2015 to respond to the Plaintiff's Motion for Partial
 21 Summary Judgment filed April 15, 2015. This stipulation is submitted and based upon the following:

- 22 1. That Plaintiff's counsel has requested this extension of time and has informed
 23 Defendants' counsel that such an extension is necessary because counsel for Plaintiff
 24 has been experiencing a heavy workload with numerous court and administrative

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hearings, attending and/or giving testimony at legislative hearings and working on lobbying efforts, written discovery, several depositions, three Early Neutral Evaluation Conferences, one Supreme Court of Nevada settlement conference, two appellate briefs in workers' compensation judicial review matters in state court, and responding to another Motion for Summary Judgment that is now due on Friday, May 1, 2015. Further Plaintiff's Counsel was out of town taking his son to California so that he could attend the Star Wars Celebration in Anaheim April 16-19 which had been planned for almost two years and pre-paid. As a result, during the time since the Defendants filed the motion, Plaintiff's counsel has not had sufficient time to respond to the Motion for Summary Judgment.

2. The Parties are in agreement regarding the Plaintiff's request for an 11 day extension to file her response to the Defendants' Motion for Summary Judgment. In the interests of fairness and equity the Parties agree that the Defendants may have a corresponding 11 day extension, to May 20, 2015, to respond to the Plaintiff's Motion for Partial Summary Judgment filed April 15, 2015.
3. That this request for an extension of time for Plaintiff to file his Response to Defendants' above referenced Motion for Summary Judgment, and the corresponding extension for Defendants to respond to Plaintiff's Motion for Partial Summary Judgment, is made in good faith and not for purpose of delay.

DATED this 30th day of April, 2015.

/s/ James P. Kemp
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/s/ Jamie Chu
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ORDER

Good cause appearing, the above stipulation is approved. The Plaintiff shall have through and including May 11, 2015 to file her response to the Defendants' April 6, 2015 Motion for Summary Judgment. The Defendants shall have through and including May 20, 2015 to respond to Plaintiff's Motion for Partial Summary Judgment filed April 15, 2015.

IT IS SO ORDERED



U.S. DISTRICT COURT JUDGE

Dated: April 30, 2015