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10 Attorneys for Plaintiff
MICHELLE MCKENNA

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 MICHELLE MCKENNA,

14 Plaintiff,

Case No. 2:14-cv-01773-JAD-CWH

15 vs.

16 DAVID Z. CHESNOFF, CHTD. P.C. d/b/a
CHESNOFF & SCHONFELD; DAVID Z.
17 CHESNOFF; and RICHARD A. SCHONFELD,

18 Defendants.

19 **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE FOR**
20 **DEFENDANTS' MOTION TO COMPEL INDEPENDENT MEDICAL EXAM OF**
21 **PLAINTIFF MICHELLE MCKENNA**

22 **(First Request)**

23 Pursuant to Local Rule IA 6-1, IA 6-2, 7-1, Plaintiff Michelle McKenna ("Ms. McKenna")
24 and Defendants David Z. Chesnoff, Chtd. P.C. d/b/a Chesnoff & Schonfeld; David Z. Chesnoff; and
25 Richard A. Schonfeld (collectively, "Defendants") hereby stipulate and agree as follows:

- 26 1. On July 1, 2016, Defendants filed their Motion to Compel Independent Medical
27 Exam of Plaintiff Michelle McKenna ("Motion") [ECF No. 53].
28 2. The current deadline for Ms. McKenna to respond to the Motion is July 18, 2016.

1 3. For the past six weeks, the Parties have delayed further discovery in order to engage
2 in informal settlement negotiations. See Order to Extd. Discov. (Fourth Req.), May 24, 2016 [ECF
3 No. 51].

4 4. Although the Parties have not yet reached a settlement, they have agreed to continue
5 their ongoing settlement discussions by scheduling a mediation with Hon. Jackie Glass (Ret.) on
6 July 26, 2016.

7 5. In order to: (i) avoid incurring potentially unnecessary costs and fees while the
8 parties attempt to negotiate a settlement; and (ii) allow the Parties time to attend the mediation, and,
9 if successful, finalize a settlement agreement, the Parties stipulate and agree to extend the briefing
10 schedule for the Motion as follows:

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- 1 A. Ms. McKenna will file a Response to the Motion on or before August 15,
2 2016; and
3 B. The Defendants will file a Reply in support of the Motion on or before
4 August 25, 2016.

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6 DATED this 15th day of July, 2016.

DATED this 15th day of July, 2016.

7 By: /s/ Kelly B. Stout
8 DENNIS L. KENNEDY
9 SARAH E. HARMON
10 KELLY B. STOUT
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By: /s/ Brian K. Terry
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11 Attorneys for Plaintiff
12 MICHELLE MCKENNA

Attorneys for Defendants
DAVID Z. CHESNOFF, CHTD. P.C. d/b/a
CHESNOFF & SCHONFELD; DAVID Z.
CHESNOFF; and RICHARD A. SCHONFELD

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14 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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18 Dated: July 18, 2016

19 Respectfully Submitted by:

20 BAILEY ❖ KENNEDY

21 By: /s/ Kelly B. Stout
22 DENNIS L. KENNEDY
23 SARAH E. HARMON
24 KELLY B. STOUT
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25 Attorneys for Plaintiff
26 MICHELLE MCKENNA
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