1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323 CRYSTAL J. HERRERA, ESQ., Bar # 12396 2 LITTLER MENDELSON, P.C. 3960 Howard Hughes Parkway 3 Suite 300 Las Vegas, NV 89169-5937 4 Telephone: 702.862.8800 Fax No.: 702.862.8811 5 Attorneys for Defendant, 6 TARGET CORPORATION dba TARGET 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 BARBARA J. MOOTREY, Case No. 2:15-CV-01241-APG-NJK 12 Plaintiff, 13 STIPULATION AND ORDER TO VS. CONTINUE THE EARLY NEUTRAL 14 **EVALUATION SESSION** TARGET CORPORATION, a foreign corporation d/b/a/ TARGET; DOES I 15 through X, inclusive; ROE CORPORATIONS I through X, inclusive, 16 Defendant. 17 18 19 Plaintiff BARBARA J. MOOTREY ("Plaintiff") and Defendant TARGET CORPORATION 20 dba TARGET ("Defendant"), by and through their respective counsel of record, hereby stipulate and 21 agree to vacate the date for the Early Neutral Evaluation (ENE) Session presently scheduled for 22 March 4, 2016, at 9:00 a.m., before Honorable George Foley (Dkt. #9). The parties would like to 23 reschedule the ENE Session to a date convenient for the Court and mutually agreeable between the 24 As such, the parties are available and propose the following dates for the Court's parties. 25 consideration to reschedule the ENE session: 26 March 29, 2016 27 March 31, 2016 28 LITTLER MENDELSON, P.O.

| 1           | The parties further request that the confidential written evaluation statement be due one week                          |  |
|-------------|---|--|
| 2           | prior to the new date of the ENE Session.   |  |
| 3           | This extension is sought in good faith, and not for the purpose of undue delay.   |  |
| 4           | Dated: January 15, 2016   | Dated: January 15, 2016  |
| 5           | Respectfully submitted,   | Respectfully submitted,  |
| 6           |   |  |
| 7<br>8<br>9 | /s/ Trevor J. Hatfield TREVOR J. HATFIELD, ESQ. HATFIELD & ASSOCIATES, LTD.  Attorney for Plaintiff, BARBARA J. MOOTREY | /s/ Crystal J. Herrera  ROGER L. GRANDGENETT II, ESQ. CRYSTAL J. HERRERA, ESQ. LITTLER MENDELSON, P.C.  Attorneys for Defendant, |
| 10          |   | TARGÉT CORPORATÍON dba TARGET  |
| 11<br>12    |   | <u>ORDER</u>   |
| 13          | IT IS SO ORDERED that the ENE Session shall be continued to March 29, 2016, at the                                      |  |
| 14          | hour of 9:00 a.m. In preparation for the ENE session, the attorneys for each party will submit a                        |  |
| 15          | confidential written evaluation statement for the Court's in camera review one week prior to the date                   |  |
| 16          | of the continued ENE Session, pursuant to parameters stated within ENE Order (Dkt. #9).                                 |  |
| 17          |   | Dated this 19th day of January, 2016.  |
| 18          |   |  |
| 19          |   | George Foley Jr.   |
| 20          |   | UNITED STATES MACISTRATE JUDGE   |
| 21          |   |  |
| 22          |   |  |
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