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6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

|   |   |  |
|---|---|--|
| 8 PATRICIA CORBOSIERO,                        | ) | CASE NO.: 2:16-cv-00834-JCM-CWH        |
|   | ) |  |
| 9 Plaintiff,                                  | ) |  |
|   | ) |  |
| 10 vs.  | ) | <b><u>STIPULATION AND ORDER TO</u></b> |
|   | ) | <b><u>EXTEND DEADLINES</u></b>         |
|   | ) |  |
| 11 UNIVERSAL HEALTH SERVICES, INC.,           | ) | <b>(FIRST REQUEST)</b>                 |
| 12 as Plan Administrator for the Universal    | ) |  |
| 13 Health Services, Inc. Group Supplemental   | ) |  |
| 14 Dependent Life and Accidental Death and    | ) |  |
| 15 Dismemberment Plan for employees of        | ) |  |
| 16 Universal Health Services, Inc. ("Plans"); | ) |  |
| 17 HARTFORD LIFE AND ACCIDENT                 | ) |  |
| INSURANCE CO., as Claims Administrator        | ) |  |
| 18 for the Plans; DOES I through X, and ROE   | ) |  |
| CORPORATIONS I through X, inclusive,          | ) |  |
| Defendants.                                   | ) |  |

19 IT IS HEREBY STIPULATED by the parties hereto, by and through their  
 20 undersigned counsel of record that, pursuant to LR 26-4, the Scheduling Order (Doc. # 20) be  
 21 amended as follows:

22 **I. Discovery Completed**

23 Defendant HARTFORD LIFE AND ACCIDENT INSURANCE CO. (HARTFORD)  
 24 produced its ERISA Administrative Record (AR) to Plaintiff for her review on September 1,  
 25 2016. Defendant UNIVERSAL HEALTH SERVICES, INC. (UHS) produced relevant  
 26 documents to Plaintiff on September 14, 2016. Plaintiff CORBOSIERO notified

1 UHS as to her position regarding permissible ERISA discovery on September 30, 2016.

2 The mediation between Plaintiff and HARTFORD scheduled for October 11, 2016  
3 did not take place because Plaintiff was affected by Hurricane Matthew and was unable to  
4 travel to Las Vegas in time for the mediation. The mediation has now been rescheduled for  
5 January 24, 2017 with the same mediator, Honorable Lawrence Leavitt (Ret.). This was the  
6 earliest possible date that all parties and the mediator were available for the mediation.

7 **II. Discovery Remaining and Reason for Request for Extension**

8 The current upcoming deadline for Plaintiff CORBOSIERO to notify Defendant  
9 HARTFORD as to the content of Hartford's AR and any ERISA discovery is October 25,  
10 2016. In the interest of judicial economy, Plaintiff CORBOSIERO and Defendant  
11 HARTFORD propose that all remaining deadlines between them be extended beyond the  
12 January 24, 2017 mediation to allow for possible settlement.

13 Plaintiff's dispositive motion regarding her second cause of action against Defendant  
14 UHS is currently due by November 4, 2016. Plaintiff and UHS are currently attempting to  
15 resolve this claim and therefore propose that all briefing deadlines be extended 30 days.

16 **III. Proposed Discovery Schedule**

17 **A. Plaintiff's first cause of action against Hartford:**

18 Plaintiff CORBOSIERO and Defendant HARTFORD propose the following deadline  
19 extensions regarding Plaintiff's First Cause of Action against Defendant HARTFORD (Doc  
20 #20, ¶¶ III.A through III.D):

| <u>Description:</u>   | <u>Current Deadline:</u> | <u>Proposed:</u> |
|---|--------------------------|------------------|
| 22 Plaintiff to notify Defendant Hartford<br>23 as to the content of AR and any additional<br>discovery | 10/25/16                 | 01/27/17         |
| 24 Deadline to serve discovery that the<br>25 parties agree is permissible                              | 11/22/16                 | 02/24/17         |
| 26 Filing of Simultaneous Discovery<br>Motions  | 12/02/16                 | 03/10/17         |

|   |  |          |          |
|---|--|----------|----------|
| 1 | Plaintiff's Dispositive ERISA Motion under Rule 52 and/or 56 | 12/16/16 | 03/24/17 |
| 2 |  |          |          |
| 3 | Hartford's Opposition to Dispositive Motion                  | 01/20/17 | 04/21/17 |
| 4 | Plaintiff's Reply  | 02/03/17 | 05/05/17 |

5 **B. Plaintiff's second cause of action against UHS:**

6 Plaintiff CORBOSIERO and Defendant UHS propose a 30-day extension of their  
7 remaining deadlines (Doc #20, ¶ IV.D):

| 8  | <b><u>Description:</u></b>                             | <b><u>Current Deadline:</u></b> | <b><u>Proposed:</u></b> |
|----|--|---------------------------------|-------------------------|
| 9  | Plaintiff's Dispositive Motion under Rule 52 and/or 56 | 11/04/16                        | 12/02/16                |
| 10 |  |                                 |                         |
| 11 | UHS's opposition to Dispositive Motion                 | 12/09/16                        | 01/09/17                |
| 12 | Plaintiff's Reply                                      | 12/30/16                        | 01/30/17                |

13 We, the undersigned, represent to the Court that this request for extension is made in  
14 good faith and not for purposes of delay.

15 WHEREFORE, the parties jointly request that this Court adopt the proposed  
16 scheduling as indicated above.

17 DATED: October 14, 2016

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23 DATED: October 14, 2016

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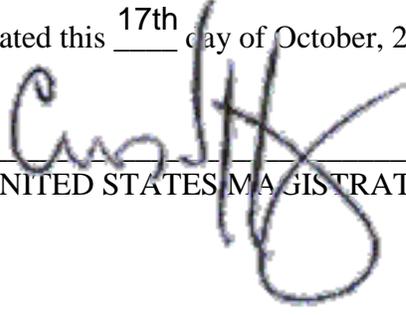
DATED: October 14, 2016

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**IT IS SO ORDERED.**

Dated this 17th day of October, 2016.

  
UNITED STATES MAGISTRATE JUDGE