

Julie A. Mersch, Esq.  
 Nevada Bar No. 004695  
 LAW OFFICE OF JULIE A. MERSCH  
 701 S.7th Street  
 Las Vegas, NV 89101  
 (702) 387-5868  
[jam@merschlaw.com](mailto:jam@merschlaw.com)  
 Attorney for Plaintiff Patricia Corbosiero

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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

IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned counsel of record that, pursuant to LR 26-4, the amended Scheduling Order dated October 17, 2016 (Doc. # 22) be amended as follows:

**I. Case Status**

Mediation between Plaintiff and Defendant HARTFORD is currently scheduled for January 24, 2017. The current scheduling deadlines regarding Plaintiff's first cause of action against Hartford will remain in force. Following the filing of the October 17, 2016 Scheduling Order, Plaintiff and Defendant UNIVERSAL HEALTH SERVICES, INC.

(UHS) entered into settlement discussions. On October 27, 2016, Plaintiff presented a demand to UHS. Defendant UHS is currently considering Plaintiff's demand, but requires additional time for its consideration due to unforeseen delays.

**II. Reason for Request for Extension**

Plaintiff's dispositive motion regarding her second cause of action against Defendant UHS is currently due by December 2, 2016. Plaintiff and UHS are currently attempting to resolve this claim and therefore propose that all briefing deadlines be extended into the new year.

**III. Proposed Discovery Schedule regarding Plaintiff's second cause of action against UHS only:**

Plaintiff CORBOSIERO and Defendant UHS propose an approximately 5-week extension of their remaining deadlines (Doc #22, ¶ III. B):

<u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
Plaintiff's Dispositive Motion under Rule 52 and/or 56	12/02/16	01/09/17
UHS's opposition to Dispositive Motion	01/09/17	02/13/17
Plaintiff's Reply	01/30/17	03/06/17

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

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

DATED: November 30, 2016

LAW OFFICE OF JULIE A. MERSCH

By: /s/ Julie A. Mersch  
JULIE A. MERSCH  
[jam@merschlaw.com](mailto:jam@merschlaw.com)  
Nevada Bar No.: 004695  
701 S. 7<sup>th</sup> Street  
Las Vegas, NV 89101  
*Attorney for Plaintiff Patricia Corbosiero*

1 DATED: November 30, 2016

FORD HARRISON

2 By: /s/ Tiffany D. Downs  
3 TIFFANY D. DOWNS  
4 [tdownloads@fordharrison.com](mailto:tdownloads@fordharrison.com)  
5 271 17th Street NW, Ste. 1900  
6 Atlanta, GA 30363

7 Eric Stryker, Esq.  
8 [eric.stryker@wilsonelser.com](mailto:eric.stryker@wilsonelser.com)  
9 Nevada Bar No. 5793  
10 Wilson, Elser, Moskowitz,  
11 Edelman & Dicker, LLP  
12 300 S. 4th Street, 11th Floor  
13 Las Vegas, NV 89101

14 *Attorneys for Defendant UHS*

15 DATED: November 30, 2016

LEWIS ROCA ROTHGERBER CHRISTIE

16 By: /s/ Ann-Martha Andrews  
17 ANN-MARTHA ANDREWS  
18 [Aandrews@lrrc.com](mailto:Aandrews@lrrc.com)  
19 Nevada Bar No. 7585  
20 3993 Howard Hughes Pkwy., Ste. 600  
21 Las Vegas, Nevada 89169  
22 *Attorneys for Defendant HARTFORD*

23 **IT IS SO ORDERED.**

24 Dated December 1, 2016

25   
26 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE