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6 Attorneys for Defendants  
 UNITED HEALTH SERVICES, INC., UHS OF DELAWARE,  
 7 INC., and VALLEY HEALTH SYSTEM, LLC

8  
 9 **UNITED STATES DISTRICT COURT**  
 10 **DISTRICT OF NEVADA**

12 ANNALISA CONNELLY,  
 13 Plaintiff,  
 14 vs.  
 15 UNITED HEALTH SERVICES, INC., a  
 Delaware Corporation; UHS OF  
 16 DELAWARE, INC., a Delaware  
 Corporation; VALLEY HEALTH  
 17 SYSTEM LLC; a Delaware Limited  
 Liability Company,  
 18  
 19 Defendants.

CASE NO. 2:16-CV-02235-JAD-VCF  
**STIPULATION AND ORDER TO EXTEND  
 TIME TO FILE A RESPONSIVE  
 PLEADING**

21 Plaintiff ANNALISA CONNELLY (“Plaintiff”) and Defendants UNITED HEALTH  
 22 SERVICES, INC., UHS OF DELAWARE, INC., and VALLEY HEALTH SYSTEM, LLC  
 23 (“Defendants”), by and through their respective counsel of record, hereby request that the Court  
 24 extend the deadline for Defendants to file their first responsive pleading, which is currently set for  
 25 October 18, 2016. The Complaint (**ECF No. 1**) is based on claims under the Americans with  
 26 Disabilities Act and is subject to the Early Neutral Evaluation (“ENE”) process set forth in Local  
 27 Rule 16-6. The parties desire to engage in the ENE process before incurring the fees and costs  
 28 associated with filing a responsive pleading and any associated opposition and reply briefs. The

1 parties agree that conserving all possible resources for settlement at the ENE conference would  
2 further the goals of judicial economy, control of the Court's docket, and an inexpensive  
3 determination of the case. Specifically, the extension requested is for a limited and reasonable  
4 amount of time. Further, ordering Defendant to proceed with filing a responsive pleading would  
5 result in an unnecessary expenditure of resources that may impede the resolution of this matter  
6 through settlement. As a result, the parties stipulate to extend the deadline for Defendant to file its  
7 responsive pleading to 14 days after the parties participate in the ENE conference. This request is  
8 made in good faith and not to cause unnecessary delay.

9 Dated: October 13, 2016

Dated: October 13, 2016

10 Respectfully submitted,

Respectfully submitted,

11  
12 /s/ Michael P. Balaban

/s/ Wendy M. Krincek

13 **LAW OFFICES OF MICHAEL P.**  
14 **BALABAN**  
MICHAEL P. BALABAN, ESQ.

**LITTLER MENDELSON, P.C.**  
WENDY MEDURA KRINCEK, ESQ.  
KAITLYN M. BURKE, ESQ.

15 Attorneys for Plaintiff  
ANNALISA CONNELLY

Attorneys for Defendants  
UNITED HEALTH SERVICES, INC., UHS OF  
DELAWARE, INC., and VALLEY HEALTH  
SYSTEM, LLC

16  
17  
18 **IT IS SO ORDERED**



19  
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: October 17, 2016

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