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*Attorneys for Plaintiff Megan E. Klatt  
and all others similarly situated*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MEGAN E. KLATT, an individual, on behalf  
of herself and all others similarly situated;

Plaintiff,

v.

DIGNITY HEALTH, a California  
corporation; DOES 1-50, unknown  
individuals; and ROE COMPANIES 1-50,  
unknown business entities,

Defendants.

Case No. 2:17-cv-02425-RFB-PAL

**STIPULATION AND ORDER  
CONTINUING DEADLINE FOR  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS  
PARTS OF PLAINTIFF'S COMPLAINT**

**(Second Request)**

Plaintiff Megan E. Klatt ("Plaintiff") and Defendant Dignity Health ("Defendant"), by and through their respective counsel of record, hereby submit this second stipulation to extend the time for Plaintiff to file its Opposition to Defendant's Motion to Dismiss Parts of Plaintiff's Complaint (the "Motion") (Dkt. 4).

**BACKGROUND**

A. On September 25, 2017, Defendant filed the Motion.

1 B. On October 5, 2017, the Court granted the Parties' stipulated Order continuing the  
2 deadline for Plaintiff's Opposition to the Motion from October 9, 2017, to October 23, 2017, and  
3 continuing the deadline for Defendant's Reply in Support of the Motion to November 13, 2017.

4 C. While Plaintiff had anticipated being able to file the Opposition by October 23,  
5 2017, conflicts have arisen that necessitate this additional extension. In particular, Plaintiff  
6 requires additional time to prepare the Opposition as Plaintiff's counsel is still working toward  
7 upcoming briefing deadlines in two separate appeals pending before the Nevada Supreme Court.  
8 In light of this, Defendant has agreed to Plaintiff's request for an additional two-day continuation  
9 of the deadline for the Opposition.

10 D. A hearing on the Motion has not yet been set.

11 **STIPULATION**

12 NOW THEREFORE, the parties hereby agree and stipulate as follows:

13 1. The deadline for Plaintiff's Opposition to the Motion shall be continued to October  
14 25, 2017; and

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1           2.       The deadline for Defendant's Reply to Plaintiff's Opposition shall remain as  
2 November 13, 2017.

3           DATED this 23rd day of October 2017.

4                                       SEMENZA KIRCHER RICKARD

5                                       /s/ Jarrod L. Rickard  
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12 *and all others similarly situated*

13                                      JACKSON LEWIS P.C.

14                                      /s/ Elayna J. Youchah  
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19                                      *Attorneys for Defendant Dignity Health*

20           **IT IS SO ORDERED.**

21                                        
22                                      \_\_\_\_\_  
23 RICHARD F. BOULWARE, II  
24 United States District Judge

25           DATED this 24th day of October 2017.