1 2 3 4 5 6 7 8 9	Kirsten A. Milton, Bar No. 14401 Daniel Aquino, Bar No. 12682 <b>JACKSON LEWIS P.C.</b> 300 South Fourth Street, Suite 900 Las Vegas, Nevada 89101 Tel: (702) 921-2460 Fax: (702) 921-2461 Attorneys for Defendant Dignity Health Lawrence J. Semenza, III, Bar No. 7174 Christopher D. Kircher, Bar No. 11176 Jarrod L. Rickard, Bar No. 10203 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 Attorneys for Plaintiff		
10	Megan Klatt, on behalf of herself and all others similarly situated		
11	UNITED STATES DISTRICT COURT		
12	DISTRICT OF NEVADA		
13 14	MEGAN KLATT, an individual, on behalf of herself and all others similarly situated,	Case No.: 2:17-cv-02425-RFB-BNW	
15	Plaintiff,	STIPULATION AND ORDER TO CONTINUE SETTLEMENT	
16	VS.	<b>DOCUMENTS DEADLINE (Fifth Request)</b>	
17 18	DIGNITY HEALTH, a California corporation; DOES 1-50, unknown individuals; and ROE COMPANIES 1-50, unknown business entities,		
19	Defendants.		
20	Plaintiff Megan Klatt ("Plaintiff"), by and through her attorneys of record, and Defendant		
21	Dignity Health ("Defendant") (collectively, the "Parties"), by and through its attorneys of record,		
22	submit this Stipulation and Order to Continue Settlement Documents Deadline (Fifth Request)		
23	(the "Stipulation").		
24	On February 28, 2019, the Parties participated in a mediation and subsequently reached a		
25	settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order		
26	to Suspend Dispositive Motion Deadlines Pending Settlement ("Stipulation to Suspend"),		
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SP.C.			
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requesting that the dispositive motion deadlines be suspended while the Parties worked diligently
 to draft and agree upon the requisite settlement documents, ECF No. 86.

On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and
directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF
No. 87.

6 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement 7 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019, 8 ECF No. 93, because they needed additional time to complete the drafting of the settlement 9 documents given the complexity of the issues and length of documents, including a Joint Motion 10 for Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of 11 Settlement, as well as various documents to be provided to the putative class members, which will 12 require Court approval.

On July 1, 2019, the Parties filed a Stipulation and Order to Continue Settlement Documents Deadline (Second Request), ECF No. 95, which the Court granted on July 3, 2019, ECF No. 96, because they needed additional time to complete the drafting of the settlement documents. The settlement papers are currently due on July 10, 2019, ECF No. 96.

On July 19, 2019, the Parties filed a Stipulation and Order to Continue Settlement
Documents Deadline (Fourth Request), ECF No. 99, which the Court granted on July 22, 2019,
ECF No. 100, because they needed additional time to complete the drafting of the settlement
documents as Plaintiff's counsel was out of the office traveling. The settlement papers are
currently due on July 26, 2019, ECF No. 100.

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1	Since the last extension was granted	l, the Parties have continued to work diligently to	
2	finalize the settlement papers and are hopeful that they have agreement on all substantive issues.		
	3 However, they still also need to secure the signatures of the respective parties. As such, the		
	4 Parties request an additional seven (7) days, through and including August 2, 2019, to get the		
	5 documents executed and submit the papers for Court approval.		
	6 This Stipulation is submitted in good faith and not for the purpose of delay.		
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8	DATED: July 26th, 2019	SEMENZA KIRCHER RICKARD	
9		/s/ Lawrence J. Semenza, III Lawrence J. Semenza, III, Bar No.7174	
10		Christopher D. Kircher, Bar No. 11176 Jarrod L. Rickard, Bar No. 10203	
11		10161 Park Run Drive, Suite 150 Las Vegas, NV 89145	
12		Attorneys for Plaintiff, on behalf of	
13		herself and all others similarly situated	
14	DATED: July 26th, 2019	JACKSON LEWIS P.C.	
15		/s/ Kirsten A. Milton	
16		Kirsten A. Milton, Bar No. 14401 Daniel I. Aquino, Bar No. 12682	
17		300 S. Fourth Street, Suite 900 Las Vegas, NV 89101	
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19		Attorneys for Defendant	
20	IT IS SO ORDERED.	A	
21		UNITED STATES MAGISTRATE JUDGE	
22		DATED this 30th day of July 2019.	
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