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

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 MEGAN E. KLATT, an individual, on behalf
of herself and all others similarly situated,
14
15 Plaintiff,
16
17 v.
18 DIGNITY HEALTH, a California
corporation; DOES 1-50, unknown
19 individuals; and ROE COMPANIES 1-50,
unknown business entities,
20
21 Defendants.

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

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE**

21 Plaintiff Megan E. Klatt and all others similarly situated ("Klatt") and Dignity Health
22 ("Dignity") (collectively, the "Parties"), by and through their respective counsel of record, hereby
23 submit this Stipulation and Order to Continue Settlement Documents Deadline (the "Stipulation").

24 On February 28, 2019, the Parties attended mediation and subsequently reached a settlement
25 in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order to Suspend
26 Dispositive Motion Deadlines Pending Settlement ("Stipulation to Suspend"), requesting that the
27 dispositive motion deadlines be suspended while the Parties worked diligently to draft and agree
28 upon the requisite settlement documents.

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1 Given the Parties' settlement, on April 10, 2019, the Court issued an Order Granting the
2 Stipulation to Suspend and directed the Parties to file a stipulation to dismiss or dispositive motions
3 by May 17, 2019.

4 The Parties are currently in the process of finalizing a host of complex and lengthy
5 settlement documents, including a Joint Motion for Preliminary Approval of Class Action
6 Settlement and the associated Joint Stipulation of Settlement, which will require Court approval.
7 As such, the Parties respectfully request an additional forty-five (45) days to submit the necessary
8 settlement documents, up to and including July 1, 2019.

9 This Stipulation is submitted in good faith and not for the purpose of delay.

10 Dated this 16th day of May, 2019.

11 SEMENZA KIRCHER RICKARD

12 /s/ Lawrence J. Semenza, III

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

21 Dated this 16th day of May, 2019.

22 JACKSON LEWIS, P.C.

23 /s/ Kristen A. Milton

24 Kristen A. Milton, Esq., Bar No. 14401
25 3800 Howard Hughes Parkway, Suite 600
26 Las Vegas, Nevada 89169

27 *Attorneys for Defendant Dignity Health*

28 **IT IS SO ORDERED.**


UNITED STATES MAGISTRATE JUDGE

DATED: May 17, 2019