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Kirsten A. Milton, Bar No. 14401 Daniel I. Aquino, Bar No. 12682 JACKSON LEWIS P.C. 300 South Fourth Street, Suite 900 Las Vegas, Nevada 89101 3 Tel: (702) 921-2460 Fax: (702) 921-2461 4 Attorneys for Defendant 5 Dignity Health 6 Lawrence J. Semenza, III, Bar No. 7174 Christopher D. Kircher, Bar No. 11176 7 Jarrod L. Rickard, Bar No. 10203 10161 Park Run Drive, Suite 150 8 Las Vegas, Nevada 89145 9 Attorneys for Plaintiff Megan Klatt, on behalf of herself 10 and all others similarly situated 11 UNITED STATES DISTRICT COURT 12 DISTRICT OF NEVADA 13 MEGAN KLATT, an individual, on behalf Case No.: 2:17-cv-02425-RFB-BNW of herself and all others similarly situated, 14 Plaintiff, STIPULATION AND ORDER TO 15 CONTINUE SETTLEMENT **DOCUMENTS DEADLINE (Second** VS. 16 Request) DIGNITY HEALTH, a California 17 corporation; DOES 1-50, unknown individuals; and ROE COMPANIES 1-50, 18 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 (Second 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 27 28 JACKSON LEWIS P.C. LAS VEGAS

to Suspend Dispositive Motion Deadlines Pending Settlement ("Stipulation to Suspend"), 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.

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

Since then, the Parties have continued to work diligently to finalize the settlement papers and have exchanged multiple drafts of the settlement papers. The Parties are close to finalizing those papers, but need a short extension of time to complete the documents. The Parties

1	anticipate being able to submit the papers for Court approval on or before July 10, 2019. As such,
2	the Parties respectfully request an additional nine (9) days to submit the necessary, up to and
3	including July 10, 2019.
4	This Stipulation is submitted in good faith and not for the purpose of delay.
5	
6	DATED: July 1st, 2019 SEMENZA KIRCHER RICKARD
7	/s/ Lawrence J. Semenza, III Lawrence J. Semenza, III, Bar No.7174
8	Christopher D. Kircher, Bar No. 11176 Jarrod L. Rickard, Bar No. 10203
9	10161 Park Run Drive, Suite 150 Las Vegas, NV 89145
10	Attorneys for Plaintiff, on behalf of herself and all others similarly situated
11	nersen and an others similarly situated
12	DATED: July 1st, 2019 JACKSON LEWIS P.C.
13	/s/ Kirsten A. Milton
14	Kirsten A. Milton, Bar No. 14401 Daniel I. Aquino, Bar No. 12682
15	300 S. Fourth Street, Suite 900 Las Vegas, NV 89101
16	
17	Attorneys for Defendant
18	IT IS SO ORDERED.
19	UNITED STATES MAGISTRATE JUDGE
20	DATED this 3rd day of July 2019.
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