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*Attorney for Plaintiff Sondra Williamson*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SONDRA WILLIAMSON	)	CASE NO.: 2:17-cv-02653-RFB-CWH
	)	
Plaintiff,	)	
	)	<b><u>STIPULATION AND ORDER TO</u></b>
vs.	)	<b><u>EXTEND DEADLINES</u></b>
	)	
AETNA LIFE INSURANCE COMPANY,	)	<b>(FIRST REQUEST)</b>
as Claims Administrator for the Bank of	)	
America Long-Term Disability Plan; DOES I	)	
through V; and ROE CORPORATIONS I	)	
through V, inclusive,	)	
	)	
Defendants.	)	
	)	
	)	

IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned counsel of record that, pursuant to LR 26-4, the Scheduling Order (Doc. # 8) be amended as follows:

**I. Discovery Completed**

Defendant AETNA LIFE INSURANCE COMPANY (AETNA) produced its ERISA Administrative Record (AR) to Plaintiff for her review on January 16, 2018, and supplemented the AR with additional Plan Documents on February 6, 2018. Plaintiff reviewed the AR and determined that additional discovery is not necessary. Discovery briefs were not filed.

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1 **II. Discovery Remaining and Reason for Request for Extension**

2 Defendant will file the joint AR with this court by April 4, 2018. Plaintiff's Rule 52  
3 and/or Rule 56 Motion is due by May 2, 2018. Defendant's response is due by June 1, 2018,  
4 and Plaintiff's reply is due by June 15, 2018. Attorney for Plaintiff is scheduled to be out of  
5 the country for two weeks in April, and will need additional time to file the Rule 52/Rule 56  
6 Motion.

7 **III. Proposed Discovery Schedule**

8 Plaintiff WILLIAMSON and Defendant AETNA agree and stipulate to the following  
9 proposed deadline extensions:

<u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
11 Plaintiff's Dispositive ERISA Motion under Rule 52 and/or 56	05/02/18	05/18/18
12 Aetna's Response to Dispositive 13 Motion	06/01/18	06/18/18
14 Plaintiff's Reply	06/15/18	07/02/18

15 We, the undersigned, represent to the Court that this request for extension is made in  
16 good faith and not for purposes of delay.

17 WHEREFORE, the parties jointly request that this Court adopt the proposed  
18 scheduling deadlines as indicated above.

19 DATED: March 28, 2018

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20  
21 By: /s/ Julie A. Mersch  
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24 *Attorney for Plaintiff WILLIAMSON*

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DATED: March 28, 2018

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Ann-Martha Andrews  
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*Attorneys for Defendant AETNA*

**IT IS SO ORDERED:**

Dated March 30, 2018

  
UNITED STATES MAGISTRATE JUDGE