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8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **FOR THE DISTRICT OF NEVADA**

10 Sondra Williamson,

11 Plaintiff,

12 vs.

13 Aetna Life Insurance Company, as Claims  
 14 Administrator for the Bank of America  
 15 Long-Term Disability Plan; Does I  
 16 through V; Roe Corporations I through V,  
 17 inclusive,

18 Defendants.

No. 2:17-CV-02653-RFB-CWH

**STIPULATION AND ORDER TO  
 EXTEND DEADLINES**

**(THIRD REQUEST)**

19 Defendant Aetna Life Insurance Company and Plaintiff Sondra Williamson  
 20 hereby jointly stipulate and move for an order amending the Court's Scheduling  
 21 Order (ECF 8) pursuant to LR 26-4. This request is made in the interest of justice,  
 22 in order to correct an error made by the defendant's counsel in production of the  
 23 ERISA Administrative Record before the briefing commences.

**I. Discovery Completed/Remaining**

24 This Court entered its Scheduling Order on December 21, 2017. (ECF 8). In  
 25 accordance with the schedule, Aetna's counsel produced a copy of the ERISA  
 26 Administrative Record to Williamson's counsel on January 15, 2018. Also in  
 27 accordance with the schedule, Aetna filed a copy of the Administrative Record with  
 28 the Court on April 4, 2018. (ECF 12). The original briefing schedule was adjusted  
 slightly. (ECF 10, 14).

1     **II. Reason for Request for Extension**

2             Aetna’s counsel has recently become aware that, due to a mistake by  
3 counsel, the ERISA Administrative Record produced to Williamson’s counsel was  
4 substantially incomplete. The same incomplete record was filed with the Court.  
5 Aetna’s counsel notified Williamson’s counsel of the error.

6     **III. Proposed Discovery Schedule**

7             The parties now request that in order to ensure that Williamson’s counsel and  
8 the Court have access to the complete Administrative Record, the Scheduling Order  
9 be amended as follows:

- 10             • Aetna will produce the complete Administrative Record to  
11 Williamson’s counsel by Friday, June 8, 2018 (original deadline:  
12 January 15, 2018).
- 13             • Aetna will file the complete Administrative Record with the Court by  
14 Friday, June 22, 2018 (original deadline: April 4, 2018).
- 15             • Williamson’s opening brief on the merits of the ERISA claim will be  
16 due on Friday, July 6, 2018 (currently due June 1, 2018).
- 17             • Aetna’s opposition brief on the merits of the ERISA claim will be due  
18 on Friday, August 24, 2018 (currently due July 2, 2018).
- 19             • Williamson’s reply brief on the merits of the ERISA claim will be due  
20 on Friday, September 21, 2018 (currently due July 16, 2018).

21             The undersigned represent to the Court that this request for extension is  
22 made in good faith and not for purposes of delay.

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1 Accordingly, the parties jointly request the Court to adopt the proposed  
2 scheduling deadlines as indicated above.

3 DATED this 30th day of May 2018.

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

6  
7 By: /s/ Ann-Martha Andrews  
8 Ann-Martha Andrews  
9 2415 East Camelback Road, Suite 800  
10 Phoenix, Arizona 85016  
11 Attorneys for Defendant Aetna Life  
12 Insurance Company

13 DATED this 30th day of May 2018.

14 LAW OFFICE OF JULIE A. MERSCH

15 By: /s/ Julie A. Mersch  
16 Julie A. Mersch  
17 701 S. 7th Street  
18 Las Vegas, Nevada 89101  
19 Attorneys for Plaintiff Sondra Williamson

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21 IT IS SO ORDERED.

22 DATED: June 21, 2018

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25 C.W. HOFFMAN, JR.  
26 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of May 2018, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing was sent to the following CM/ECF registrant:

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/s/ Diane M. Kelly  
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