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

12 HONGHUI DENG,
 13 Plaintiff,
 14 vs.
 15 THE STATE OF NEVADA *ex rel.* THE
 BOARD OF REGENTS OF THE NEVADA
 16 SYSTEM OF HIGHER EDUCATION ON
 BEHALF OF THE UNIVERSITY OF
 17 NEVADA, LAS VEGAS; KEAH-CHOON
 TAN,
 18 Defendants.
 19

CASE NO.: 2:17-cv-03019-APG-VCF

**STIPULATION TO VACATE AND
 RESCHEDULE EARLY NEUTRAL
 EVALUATION**

20 IT IS STIPULATED AND AGREED by Defendants, the State of Nevada ex rel. Board of
 21 Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Las
 22 Vegas (“UNLV”), and Keah-Choon Tan (“Tan”), by and through counsel, Lynda P. King, Esq.,
 23 Assistant General Counsel, University of Nevada, Las Vegas, Office of General Counsel, and
 24 Plaintiff, Honghui Deng, by and through his counsel, Robert P. Spretnak, of the Law Offices of
 25 Robert P. Spretnak, that, for good cause, the Early Neutral Evaluation (“ENE”) currently set for
 26 March 8, 2018 at 9:30 a.m. should be vacated and rescheduled. **ECF No. 6.**

27 Upon receipt of the Order Scheduling the ENE, Defendant Tan advised counsel he is unable
 28 to appear at the ENE due to pre-arranged international travel (to Malaysia) from February 12, 2018

1 through March 15, 2018. Defendant Tan is unable to cancel his previously scheduled travel. At the
2 time Defendant Tan advised counsel of his pre-planned travel, he concurrently provided proof of his
3 travel plans in the form of an e-ticket, which was purchased on April 27, 2017.

4 In light of Defendant Tan's inability to appear on March 8, 2018, Defendant representative,
5 Brent Hathaway, Dean of the UNLV Business School, provided his availability for late March or
6 early April, but advises that he has international travel planned from April 19 - 30, 2018.

7 UNLV is part of the self-funded Tort Claims Fund, managed by State of Nevada, Office of
8 Attorney General, Nancy L. Katafias, Tort Claims Manager, who is a representative that must be
9 present for all potential settlement discussions. Ms. Katafias informed Defendants' counsel of her
10 availability, as follows: any Monday, Wednesday, or Thursday after March 15, 2018, with the
11 exception of April 23-27, 2018, and May 9-22, 2018.

12 Plaintiff and his counsel are available during the last week of March and the first two weeks
13 of April.

14 **As such, it appears that all Parties and their required representatives are available on**
15 **April 2, 4, 5, or 9, 2018.**

16 Based on the foregoing, Parties submit good cause exists and requests this Court vacate and
17 reschedule the ENE to ensure the presence of key individuals to support the utility and purpose of
18 the ENE session.

19 DATED: December 19, 2017

DATED: December 19, 2017

20 /S/ LYNDA P. KING

/S/ ROBERT P. SPRETNAK

21 LYNDA P. KING

ROBERT P. SPRETNAK, ESQ.

22 Assistant General Counsel

Bar No. 5135

23 Nevada Bar No. 7047

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ORDER

IT IS HEREBY ORDERED that the ENE currently scheduled for March 8, 2018 is **VACATED** and **CONTINUED** to 9:30 a.m. on April 4, 2018.

IF IS FURTHER ORDERED that confidential ENE statements are due to Chambers no later than 3:00 p.m. on March 28, 2018.

IT IS FURTHER ORDERED that all other instructions within the original Order Scheduling ENE (ECF No. 6) shall remain as is.

DATED this 20th day of December, 2017.



UNITED STATES MAGISTRATE JUDGE