JENNY L. FOLEY, Ph.D., ESQ. Nevada Bar No. 9017 2 HKM EMPLOYMENT ATTORNEYS LLP 1785 E. Sahara Ave, Suite 325 3 Las Vegas, NV 89104 Tel: (702) 625-3893 4 Fax: (702) 625-3893 E-mail: jfoley@hkm.com Attorney for Plaintiff 6 UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** 7 8 CATHERINE FLEMING, An Individual) CASE NO. 2:17-cv-03049-JAD-CWH 9 Plaintiff.) 10 VS. 11 12 CIGNA HEALTHCARE, DOES I-X; ROE CORPORATIONS I-X. 13 Defendants. 14 15 STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO 16 **DEFENDANT'S PARTIAL MOTION TO DISMISS** (SECOND REQUEST) 17 COMES NOW, the Plaintiff, CATHERINE FLEMING ("Fleming"), by and through 18 19 her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT 20 ATTORNEYS LLP, and Defendant, CIGNA HEALTHCARE ("CIGNA"), by and through its 21 attorneys, WENDY MEDURA KRINCEK, ESQ., and KAITLYN M. BURKE, ESQ., of 22 LITTLER MENDELSON, P.C., hereby stipulate and agree as follows: 23 1. That the Opposition to the Defendant's Partial Motion to Dismiss due on 24 February 22nd, 2018, may be due on March 1st, 2018. 25 26 2. That the Reply to the Opposition to the Defendant's Partial Motion to Dismiss 27 remains due on March 8th, 2018. 28

Page **1** of **3**

1	3. The hearing shall remain scheduled for March 12, 2018.		
2	4. This extension of time is made in good faith and not for purposed of delay.		
3	Plaintiff's counsel has had a death in the family.		
4	5. This is the second request for an extension of time in this matter.		
5	This is the second request for an entension of this in this matter.		
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7	7 Dated this 23^{rd} day of February, 2018. Dated th	is $\underline{23^{rd}}$ day of February,	
8	2018		
9	9 HKM Employment Attorneys LLP Littler M	Iendelson, P.C.	
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11	7 57 John 20 Cool 3	Caitlyn M. Burke	
12		Iedura Krincek, Esq. I. Burke, Esq.	
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1	<u>ORDER</u>		
2	The Court having reviewed the foregoing STIPULATION AND ORDER TO EXTEND		
3	THE TIME TO RESPOND TO DEFENDANT'S PARTIAL MOTION TO DISMISS in the		
4 5	above-entitled matter and for good cause appearing therefor,		
6	IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss		
7	shall be due on March 1st, 2018;		
8	IT IS SO ORDERED that the Reply to the Opposition to the Defendant's Partial		
9	Motion to Dismiss shall be due on March 8 th , 2018;		
10	IT IS SO ORDERED that the hearing on this matter shall remain scheduled for March		
11	12 th , 2018.		
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13	Dated: February 23, 2018.		
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15 16			
17	X		
18	UNITED STATES DISTRICT JUDGE		
19	CIVITED STATES DISTRICT SODGE		
20	Respectfully submitted by: HKM Employment Attorneys LLP		
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22	/s/ Genny L. Foley		
23	Jenny L. Foley, Ph.D., Esq.		
24	Nevada Bar No. 9017 1785 East Sahara Ave, Suite 325 Las Vegas, Nevada 89104 Attorney for Plaintiff		
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