

**JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

**HKM EMPLOYMENT ATTORNEYS LLP**

1785 E. Sahara Ave, Suite 325

Las Vegas, NV 89104

Tel: (702) 625-3893

Fax: (702) 625-3893

E-mail: jfoley@hkm.com

*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CATHERINE FLEMING, An Individual

CASE NO. **2:17-cv-03049-JAD-CWH**

Plaintiff,

vs.

CIGNA HEALTHCARE, DOES I-X;  
ROE CORPORATIONS I-X.

Defendants.

**STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO  
DEFENDANT'S PARTIAL MOTION TO DISMISS  
(SECOND REQUEST)**

COMES NOW, the Plaintiff, CATHERINE FLEMING ("Fleming"), by and through her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and Defendant, CIGNA HEALTHCARE ("CIGNA"), by and through its attorneys, WENDY MEDURA KRINCEK, ESQ., and KAITLYN M. BURKE, ESQ., of LITTLER MENDELSON, P.C., hereby stipulate and agree as follows:

1. That the Opposition to the Defendant's Partial Motion to Dismiss due on February 22<sup>nd</sup>, 2018, may be due on March 1<sup>st</sup>, 2018.

2. That the Reply to the Opposition to the Defendant's Partial Motion to Dismiss remains due on March 8th, 2018.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. The hearing shall remain scheduled for March 12, 2018.

4. This extension of time is made in good faith and not for purposed of delay.

Plaintiff's counsel has had a death in the family.

5. This is the second request for an extension of time in this matter.

Dated this 23<sup>rd</sup> day of February, 2018.  
2018

Dated this 23<sup>rd</sup> day of February,  
2018

**HKM Employment Attorneys LLP**

**Littler Mendelson, P.C.**

/s/ Jenny L. Foley  
Jenny L. Foley, Ph.D., Esq.  
Nevada Bar No. 9017  
1785 East Sahara Ave., Suite 325  
Las Vegas, Nevada 89104

/s/ Kaitlyn M. Burke  
Wendy Medura Krincek, Esq.  
Kaitlyn M. Burke, Esq.  
Nevada Bar No. 6417  
Nevada Bar No. 13454  
3960 Howard Hughes Parkway  
Suite 300  
Las Vegas, Nevada 89169

///  
///  
///  
///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

**IT IS SO ORDERED** that the Opposition to the Defendant's Partial Motion to Dismiss shall be due on March 1<sup>st</sup>, 2018;

**IT IS SO ORDERED** that the hearing on this matter shall remain scheduled for March 12<sup>th</sup>, 2018.

Respectfully submitted by:  
**HKM Employment Attorneys LLP**

Respectfully submitted by:  
**HKM Employment Attorneys LLP**

---

*/s/ Jenny L. Foley*  
 Jenny L. Foley, Ph.D., Esq.  
 Nevada Bar No. 9017  
 1785 East Sahara Ave, Suite 325  
 Las Vegas, Nevada 89104  
*Attorney for Plaintiff*