| 1 | JENNY L. FOLEY, Ph.D., ESQ. | | |
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| 2 | Nevada Bar No. 9017 HKM EMPLOYMENT ATTORNEYS LLP | | |
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| | Fax: (702) 625-3893 | | |
| 5 | E-mail: jfoley@hkm.com Attorney for Plaintiff | | |
| 6 | UNITED STATES DISTRICT COURT DISTRICT OF NEVADA | | |
| 7 | DISTRICT OF NEVADA | | |
| 8 | COLLEEN HARRINGTON, An Individual) CASE NO. 2:18-cv-00009-APG-PAL | | |
| 9 |) Plaintiff,) | | |
| 10 | | | |
| 11 | VS.) | | |
| 12 | STATE OF NEVADA, ex rel. COLLEGE) OF SOUTHERN NEVADA, DOES I-X.) | | |
| 13 |) | | |
| 14 | Defendants.) | | |
| 15 | , | | |
| 16 | STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS | | |
| 17 | (SECOND REQUEST) | | |
| 18 | COMES NOW, the Plaintiff, COLLEEN HARRINGTON ("Harrington"), by and | | |
| 19 | through her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT | | |
| 20 | ATTORNEYS LLP, and Defendant, STATE OF NEVADA, ex rel. COLLEGE OF | | |
| 21 | SOUTHERN NEVADA ("CSN"), by and through its attorney, DIANE L. WELCH, ESQ., of | | |
| 22 | OFFICE OF GENERAL COUNSEL FOR THE COLLEGE OF SOUTHERN NEVADA, | | |
| 23 | hereby stipulate and agree as follows: | | |
| 24 25 | 1. That the Opposition to the Defendant's Motion to Dismiss currently due on | | |
| | | | |
| 26 | February 22^{nd} , 2018, may be due on March 1^{st} , 2018. | | |
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| | Dockets.Justia.c | | |

| 1 | 2. | That the Reply to the Opposition | to the Defendant's Partial Motion to Dismiss | | |
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| 2 | be due on March 15 th , 2018. | | | | |
| 3 | 3. This extension of time is made in good faith and not for purpose of delay and is | | | | |
| 4 | based on Plaintiff's council having a death in the family. | | | | |
| 5 | 4. This is the second request for an extension of time in this matter. | | | | |
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| 7 8 | Dated this | 23 rd day of February 2018 | Dated this <u>23rd</u> day of February, | | |
| 8 9 | | <u>_23rd</u> day of February, 2018. | Dated this <u>23</u> day of redudity, | | |
| 10 | 2018. | | | | |
| 11 | HKM Empl | loyment Attorneys LLP | Office of General Counsel | | |
| 12 | /s/ Jenny . | S. Folen | /s/ Diane L. Welch | | |
| 13 | Jenny L. Fol | ey, Ph.D., Esq. | Diane L. Welch, Esq. | | |
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| 15 | Las Vegas, I | Nevada 89104 | Las Vegas, Nevada 89146 | | |
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| 1 | ORDER | | |
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| 2 | The Court having reviewed the foregoing STIPULATION AND ORDER TO EXTEND | | |
| 3 | THE TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS in the above-entitled | | |
| 4 | matter and for good cause appearing therefor, | | |
| 5 | IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss | | |
| 6 7 | shall be due on March 1 st , 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 15 th , 2018. | | |
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| 16 17 | UNITED STATES DISTRICT JUDGE | | |
| 17 | Dated: February 27, 2018. | | |
| 19 | Respectfully submitted by: HKM Employment Attorneys LLP | | |
| 20 | | | |
| 21 | /s/Jenny L. Foley | | |
| 22 | Jenny L. Foley, Ph.D., Esq. Nevada Bar No. 9017 | | |
| 23 | 1785 East Sahara Ave, Suite 325 Las Vegas, Nevada 89104 | | |
| 24 | Attorney for Plaintiff | | |
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