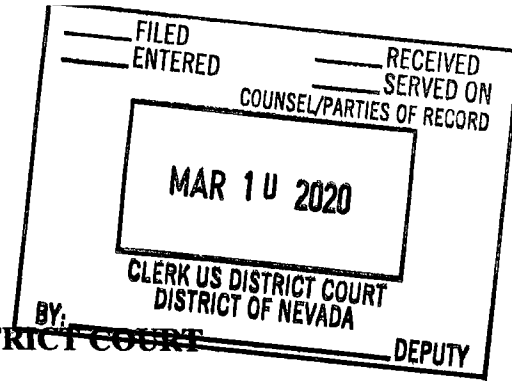


1 **COLLEEN HARRINGTON**
 2 10429 Armand Ave.
 3 Las Vegas, Nevada 89129
 4 Tel: (702) 204-6948
 E-mail: CH302@aol.com
 Plaintiff



UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

7 COLLEEN HARRINGTON, AN
8 INDIVIDUAL,

9 Plaintiff,

10 vs.

11 STATE OF NEVADA, EX REL. NEVADA
 12 SYSTEM OF HIGHER EDUCATION,
 COLLEGE OF SOUTHERN NEVADA, DOES
 I-X,

13 Defendant

Case No.: 2:18-cv-00009-APG-BNW

HEARING DATE CHANGE

14 COMES NOW, Plaintiff Colleen Harrington (or "Plaintiff"), appearing pro se,
 15 submits this request for changing the April 3, 2020 hearing to any date before April 1 or after
 16 April 12, 2020.

17 3) This Request will address three points: 1) Plaintiff 's request to change
 18 hearing date due to unavailability 2) Original request for continuance and 3) Demand for prior
 19 discovery.
 20

21 **POINTS**

22 1) Plaintiff 's request to change hearing date due to unavailability

23 The Plaintiff is unavailable April 2 to April 12, 2020. Plaintiff has attempted to meet and confer
 24 with previous and current defense counsel to no avail. Plaintiff contacted Mr. Hinckley on
 25 February 15, 2020, after receiving the notice of hearing date. Plaintiff then contacted the Judge's
 26

1 office for potential dates on February 18 and was provided possible dates of February 28 and
2 March 3. Plaintiff presented these options to Mr. Hinckley on February 18; however, he was
3 unavailable on those dates. Since Mr. James Martines has taken over as defense counsel Plaintiff
4 sent an email and called his office on March 4, 2020. CSN General Counsel Specialist responded
5 (see attached email) there was not an objection to postpone the hearing until the week of April
6 13th. April 2-12, 2020 are the only dates in 2020 the Plaintiff is unavailable.
7

8 2) Original request for continuance

9 Plaintiff requested the original time extension to encompass the Response to the Motion for
10 Summary Judgement, as well as other case related actions on February 3, 2020. No response was
11 received so Plaintiff was forced to file the Response to the Motion for Summary Judgement on
12 February 12, 2020, the deadline. After filing the response this hearing was set, negating one issue
13 for the hearing.
14

15 3) Demand for Prior Discovery

16 The parties who failed to comply with responding to discovery requests and file a modified
17 Stipulated Discovery Plan and Scheduling Order, Richard Hinckley and Jenny Foley, are no
18 longer attached to this case and should be present for the hearing to provide explanations for the
19 lack of discovery.
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1 For the foregoing reasons, Plaintiff respectfully requests the Court change the date of this
2 hearing.


3 DATED: March 10, 2020.

4
5
6 Plaintiff name
7 Colleen Harrington
8 10429 Armand Avenue
9 Las Vegas, Nevada 89129
10 Tel: (702) 204-6948

11 IT IS ORDERED that ECF No. 59 is
12 GRANTED. The hearing previously
13 scheduled for 4/3/2020 is rescheduled
14 to 4/16/2020 at 9:00 a.m. in courtroom
15 3B.

16 **IT IS SO ORDERED**

17 **DATED: March 11, 2020**

18 

19 **BRENDA WEKSLER**
20 **UNITED STATES MAGISTRATE JUDGE**
21
22
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27

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this 10th day of March, 2020, I caused to be served a true
3 and correct copy of the foregoing CERTIFICATE OF SERVICE on the following persons as
4 follows:

5 This envelope was addressed to:

6 James J. Martines, Nevada System of Higher Education, 4300 S. Maryland
7 Parkway, Las Vegas, NV 89119.
8

9
10 X by placing the same for mailing in the United States Mail, in a sealed
11 envelope on which first class postage was prepaid in Las Vegas, Nevada.
12

13 /s/ _____
14

15 Colleen Harrington
16 Plaintiff
17
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23
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27

Harrington v. CSN - Request for April 3rd date change

Knoblach, Stephanie <Stephanie.Knoblach@CSN.EDU>

Tue 3/10/2020 9:46 AM

To: Harrington, Colleen <Colleen.Harrington@CSN.EDU>

Cc: James Martines <jmartines@nshe.nevada.edu>; Cindy Hunt <chunt@nshe.nevada.edu>

Ms. Harrington,

Mr. Martines has reviewed your request for a change of hearing date in the above-referenced case. CSN will not object to moving the hearing to the week of April 13th.

Thank you,

Stephanie Knoblach
Sr. Specialist
Office of General Counsel
College of Southern Nevada
6375 W. Charleston Blvd. (WCE310)
Las Vegas, Nevada 89146
(702) 651-7488