

1 WENDY MEDURA KRINCEK, ESQ., Bar # 6417  
KAITLYN M. BURKE, ESQ., Bar # 13454  
2 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
3 Suite 300  
Las Vegas, NV 89169-5937  
4 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
5 Email: wkrincek@littler.com  
Email: kmburke@littler.com

6 Attorneys for Defendant  
7 VALLEY HEALTH SYSTEM, LLC d/b/a SUMMERLIN  
MEDICAL CENTER  
8

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 JOSEPH ANORUO,  
13 Plaintiff,

14 vs.

15 VALLEY HEALTH SYSTEM, LLC  
16 d/b/a SUMMERLIN HOSPITAL AND  
MEDICAL CENTER,  
17 Defendants.

Case No. 2:18-cv-00105-MMD-NJK

**DEFENDANT'S MOTION TO  
RESCHEDULE EARLY NEUTRAL  
EVALUATION SESSION**

**(FIRST REQUEST)**

18  
19 Defendant VALLEY HEALTH SYSTEM, LLC d/b/a SUMMERLIN HOSPITAL AND  
20 MEDICAL CENTER ("Summerlin Hospital" or "Defendant")<sup>1</sup>, by and through its attorneys of  
21 record, Littler Mendelson, P.C., hereby requests that Magistrate Judge Peggy A. Leen reschedule the  
22 Early Neutral Evaluation Session ("ENE") currently set for 9:30 a.m. on March 28, 2018 (**ECF No.**  
23 **8**) due to Defendant's unavailability on that date as defense counsel both have pre-existing  
24 commitments out of the office that week. Defendant requests that the Court reschedule the ENE for  
25 the next available time with the exception of Defendant's conflicts on March 26-30 and April 24-27.

26 The undersigned counsel attempted to confer with Plaintiff regarding this request on January  
27

28 <sup>1</sup> Valley Health System, LLC is incorrectly named in this lawsuit as it did not employ Plaintiff; Summerlin Hospital Medical Center, LLC is the correct entity.

1 31, 2018. No response was received. This is the first request by Defendant to reschedule the ENE  
2 and such request is not sought for any improper purpose or other reason of delay.

3 Dated: February 2, 2018.

4 Respectfully submitted,


5 /s/ Kaitlyn M. Burke, Esq.  
6 WENDY MEDURA KRINCEK, ESQ.  
7 KAITLYN M. BURKE, ESQ.  
8 Littler Mendelson, P.C.

9 Attorneys for Defendant  
10 VALLEY HEALTH SYSTEM, LLC d/b/a  
11 SUMMERLIN HOSPITAL AND MEDICAL  
12 CENTER

13 The plaintiff having not opposed the defendant's request to continue the ENE,

14 **IT IS ORDERED** that the ENE Conference currently scheduled for March 28, 2018, at  
15 9:30 a.m., is VACATED and CONTINUED to Thursday, April 5, 2018, at 1:30 p.m., in  
16 Chambers Room 3071. Confidential ENE statements shall be due to Chambers no later  
17 than 4:00 p.m., March 29, 2018. All other instructions within the original Order Scheduling  
18 Early Neutral Evaluation Session (ECF No. 8) shall remain in effect.

19 Dated: February 21, 2018

20   
21 Peggy A. Leen  
22 United States Magistrate Judge  
23  
24  
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1 **PROOF OF SERVICE**

2 I am a resident of the State of Nevada, over the age of eighteen years, and not a party to the  
3 within action. My business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada  
4 89169-5937. On February 2, 2018, I served the within document(s):

5 **DEFENDANT’S MOTION TO RESCHEDULE EARLY**  
6 **NEUTRAL EVALUATION SESSION**

- 7  By **United States Mail** – a true copy of the document(s) listed above for collection and  
8 mailing following the firm’s ordinary business practice in a sealed envelope with postage  
9 thereon fully prepaid for deposit in the United States mail at Las Vegas, Nevada addressed as  
10 set forth below.
- 11  By **CM/ECF Filing** – Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced document  
12 was electronically filed and served upon the parties listed below through the Court’s Case  
13 Management and Electronic Case Filing (CM/ECF) system:

14 Dr. Joseph Anoruo  
15 6322 Isabel Cove Avenue  
16 Las Vegas, NV 89139

17 *Pro Se Plaintiff*

18 I am readily familiar with the firm's practice of collection and processing correspondence for  
19 mailing and for shipping via overnight delivery service. Under that practice it would be deposited  
20 with the U.S. Postal Service or if an overnight delivery service shipment, deposited in an overnight  
21 delivery service pick-up box or office on the same day with postage or fees thereon fully prepaid in  
22 the ordinary course of business.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
24 February 2, 2018, at Las Vegas, Nevada.

25 /s/ Erin J. Melwak  
26 Erin Melwak

27 Firmwide:152601034.1 069080.1107