

1 JULIE A. MERSCH, ESQ.
 Nevada Bar No. 004695
 2 LAW OFFICE OF JULIE A. MERSCH
 701 S.7th Street
 3 Las Vegas, NV 89101
 (702) 387-5868
 4 Fax: (702) 387-0109
 5 jam@merschlaw.com

6 Attorney for Plaintiff

7 Georlen Spangler, Esq.
 Nevada Bar No. 3818
 8 LAW OFFICE OF GEORLEN K. SPANGLER
 2620 Regatta Drive, Suite 102
 9 Las Vegas, Nevada 89128
 Phone: 702.381.5830
 10 E-Mail: spanglerlaw@outlook.com

11 Attorneys for Defendant

12 **Admitted Pro Hac Vice**

Iwana Rademaekers, TX Bar No. 16452560
 13 LAW OFFICES OF IWANA RADEMAEKERS, P.C.
 14 14785 Preston Road, Suite 550
 Dallas, Texas 75254
 15 Main: (214) 579-9319
 Fax: (469) 444-6456
 16 Email: iwana@rademaekerslaw.com

17 Attorneys for Defendant

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 TATIANA BUSHEE,
 21 Plaintiff,
 22 v.
 23 LIBERTY LIFE ASSURANCE
 COMPANY OF BOSTON as Claims
 24 Administrator for the Safeway, Inc. Group
 Disability Income Plan; DOES I through
 25 V; and ROE CORPORATIONS I through
 26 V, inclusive,
 27 Defendant.

Case No. 2:18-CV-00804-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND CERTAIN DEADLINES**

FIRST REQUEST

28

1 IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned
2 counsel that, pursuant to LR 26-4, certain deadlines entered by the Court during the Hearing on
3 July 5, 2018, be amended as follows:

4
5 Certain documents were requested by Plaintiff to be added to the Administrative Record.
6 Defendant does not object to the inclusion of these additional documents to the Record and
7 Defendant's counsel is in the process of obtaining these documents and requires additional time
8 to do so. As such, the Parties are unable to file a complete Administrative Record at this time.
9 Additionally, until such time as Plaintiff can review these additional documents being gathered
10 by Defendant, the Parties cannot make an accurate representation to the court in their Joint
11 Statement regarding unresolved issues. Accordingly, the parties request the following revisions
12 to the current schedule:

12 **PROPOSED SCHEDULE**

13 <u>Deadline</u>	13 <u>Current</u>	13 <u>Proposed</u>
14 Last day to file Joint Administrative Record	14 Aug. 29, 2018	14 Sept. 4, 2018
15 Last day to file Joint Statement	15 Aug. 29, 2018	15 Sept. 4, 2018

16 We, the undersigned, agree to the proposed scheduling as indicated above. We, the
17 undersigned, also represent to the Court that we are working together cooperatively and in good
18 faith to resolve the issues described above. The extension of these deadlines will not affect any
19 other deadlines previously set by the Court.

20 DATED this 29th day of August 2018.

21 LAW OFFICE OF JULIE A. MERSCH

21 LAW OFFICES OF IWANA
22 RADEMAEKERS, P.C.

23
24 /s/ Julie A. Mersch

23
24 /s/ Iwana Rademaekers

25 Julie A. Mersch, Nevada Bar No. 004695
25 701 S.7th Street
26 Las Vegas, NV 89101
26 Email: jam@merschlaw.com

25 Iwana Rademaekers, TX Bar No. 16452560
26 **Admitted Pro Hac Vice**
26 14785 Preston Rd, Suite 550
26 Dallas, Texas 75254

27 Attorneys for Plaintiff

27
28 - AND -

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

LAW OFFICE OF GEORLEN K.
SPANGLER

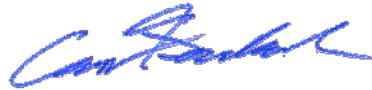
/s/ Georlen Spangler

Georlen Spangler, Nevada Bar No. 3818
2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128
Phone: 702.381.5830

Attorneys for Defendant Liberty Life
Assurance Company of Boston

ORDER

IT IS SO ORDERED August 30, 2018.



United States Magistrate Judge