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<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> APR 27 2017 </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

11 Attorneys for Defendants
12 RENOWN HEALTH (improperly named as "RENOWN
13 REGIONAL MEDICAL CENTER"), ALMA MEDINA, ALLIE
14 SAUNDERS, MEGAN PAILING, SUZANNE OETJEN, TEENA
15 THOMAS, MANDY ROBERTS, KATHERINE SIMS, LEON GILL
16 and KRISTA STRYKER

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19 SHAUN ROBINSON,
20 Plaintiff,

21 vs.

22 RENOWN REGIONAL MEDICAL
23 CENTER, ALMA MEDINA an individual,
24 ALLIE SAUNDERS an individual, TEENA
25 THOMAS an individual, KRISTA
26 STRYKER an individual, SUSAN OETJEN
27 an individual, MANDY ROBERTS an
28 individual, LEON GILL an individual,
MEGAN PAILING an individual,
KATHERINE SIMS an individual, SONIA
TORRES an individual and DOE,

Defendants.

ORDER

Case No. 3:16-cv-00372-MMD-WGC

**MOTION FOR EXCEPTION TO
ATTENDANCE REQUIREMENTS FOR
EARLY NEUTRAL EVALUATION
SESSION**

ENE DATE: MAY 12, 2017

ENE TIME: 1:30 P.M.

**MAGISTRATE JUDGE VALERIE P.
COOKE**

Defendants RENOWN HEALTH (improperly named in the Complaint as "RENOWN REGIONAL MEDICAL CENTER"), ALMA MEDINA, ALLIE SAUNDERS, MEGAN PAILING, SUZANNE OETJEN, TEENA THOMAS, MANDY ROBERTS, KATHERINE SIMS, LEON GILL and KRISTA STRYKER¹ ("Defendants"), by and through their attorneys of record, hereby file

¹ As of the date of filing this Motion, Defendants understand that Sonia Torres has not been served with the Summons and Complaint.

1 this Motion requesting permission to excuse Individual Defendants Krista Stryker, Mandy
2 Roberts, Megan Pailing, Katherine Sims, and Leon Gill from attendance at the Early Neutral
3 Evaluation ("ENE") Session set for May 12, 2017.

4 The Order Scheduling ENE Session (ECF No. 48) requires all parties to appear in
5 person for the ENE. Defendants are represented in this action by Littler Mendelson and the
6 undersigned counsel will appear at the ENE. Renown Health will be represented at the
7 ENE by Ryan Mandell, Esq., Deputy General Counsel, who will have binding authority,
8 within his discretion, to settle this matter on behalf of all of the Defendants. Any offer
9 extended on behalf of Renown will necessarily be global and include a release of all claims
10 Plaintiff has asserted against all of the Defendants. Moreover, Defendants submit that the
11 Individual Defendants have been improperly named in this lawsuit and there is no merit to
12 Plaintiff's claims asserted against them, as argued in detail in Defendants' pending Motion
13 to Dismiss (which if granted will dispose of all claims asserted against the Individual
14 Defendants). (ECF No. 27.) Discovery is also currently stayed as to the Individual
15 Defendants, pending resolution of the Motion. (ECF No. 38.)

16 Individual Defendants Suzanne Oetjen, Alma Medina, Allie Saunders and Teena
17 Thomas plan to attend the ENE. However, five Individual Defendants seek exemption from
18 the personal attendance requirements for the reasons set forth below:

19 **Krista Stryker** is currently undergoing treatment for a serious medical condition
20 and is also living with her parents in the Bay Area in California. Traveling to Reno to
21 attend the ENE would interrupt her current medical treatment.

22 **Mandy Roberts** no longer resides in Reno, Nevada. Mrs. Roberts now resides in
23 Battle Mountain which is approximately three and one-half (3.5) hours from Reno. Mrs.
24 Roberts also has a 14-month old son and her husband is often traveling for business, which
25 renders childcare and multi-day travel extremely burdensome.

26 **Megan Pailing** is scheduled to work on the day of the ENE and requests to be
27 excused in order to attend work.

28 **Katherine Sims** is graduating from nursing school on the same day as the ENE and
2.

1 requests to be excused in order to attend her graduation.

2 **Leon Gill** is now employed as a Human Resources manager for a local
3 manufacturing company and is scheduled to work on the day of the ENE. Mr. Gill requests
4 to be excused in order to attend work.

5 In consideration of the above, Renown Health respectfully requests that the Court
6 grant its request to excuse the attendance of Individual Defendants Krista Stryker, Mandy
7 Roberts, Megan Pailing, Katherine Sims, and Leon Gill at the ENE session scheduled for
8 May 12, 2017.

9 Dated: April 12, 2017

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/s/Sandra Ketner
SANDRA KETNER, ESQ.
Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendants
RENOWN HEALTH (improperly named as
"REGIONAL MEDICAL CENTER"), ALMA
MEDINA, ALLIE SAUNDERS, MEGAN PAILING,
SUSAN OETJEN, TEENA THOMAS, MANDY
ROBERTS, KATHERINE SIMS, LEON GILL and
KRISTA STRYKER

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[Handwritten Signature]
IT IS SO ORDERED
[Handwritten Signature]
U.S. MAGISTRATE JUDGE
DATED: *April 27, 2017*