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7 WAL-MART STORES, INC.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10
11 STEFANY HAZELETT,
12 Plaintiff,
13 vs.
14 WAL-MART STORES, INC., a Delaware
Corporation ,
15 Defendant.
16

Case No. 3:17-cv-00274-MMD-CBC
**[PROPOSED] STIPULATION AND ORDER
TO EXTEND DISPOSITIVE MOTION
DEADLINE**
(FOURTH REQUEST)

17 Pursuant to LR IA 6-1, 6-2, and LR 26-4, Plaintiff, STEFANY HAZELETT and Defendant,
18 WAL-MART STORES, INC., by and through their respective counsel of record, stipulate and agree
19 to a 30-day extension of the dispositive motions deadlines pending participation in a settlement
20 conference. In support of this Stipulation the parties submit that the deadline to submit dispositive
21 motions in this matter is currently January 9, 2019 (ECF No. 51). The new deadline would therefore
22 be **February 8, 2019**.

23 The parties worked diligently to schedule a mediation and have since agreed instead to seek a
24 judicial settlement conference. On August 23, 2018, the parties filed a Stipulation and Order to
25 Schedule a Settlement Conference Pursuant to LR II 16-5 (ECF No. 47). On September 24, 2018,
26 the parties' stipulation was signed by District Judge Miranda M. Du and the parties' settlement
27 conference assigned to Magistrate Judge Robert A. McQuaid, Jr., in Las Vegas. (ECF No. 50.) The
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1 parties' counsel thereafter sought dates from Magistrate Judge McQuaid's chambers. Based on
2 Magistrate Judge McQuaid's, the parties' availability, and their respective counsel's availability, a
3 settlement conference was set on January 8, 2019 at 9:45 a.m. (ECF No. 52.) However, the parties'
4 dispositive motion deadline is January 9, 2019, one day later. As such, the parties seek a 30-day
5 extension to preserve attorneys' fees and costs in the pursuit of settlement of this case.

6 This is the fourth request for an extension to the dispositive motion filing deadline. The
7 requested extension is sought in good faith and not for purposes of undue delay. The request to
8 extend the dispositive motion deadline is subject to the good cause standard as the
9 request is filed more than 21 days prior to its expiration and in order to preserve the parties'
10 resources pending participation in a settlement conference pending a setting from the Court.

11
12 Dated: November 20, 2018

Dated: November 20, 2018

13 Respectfully submitted,

Respectfully submitted,

14
15 /s/ James P. Kemp, Esq.
16 JAMES P. KEMP, ESQ.
KEMP & KEMP

/s/ Z. Kathryn Branson, Esq.
ROGER L. GRANDGENETT II, ESQ.
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LITTLER MENDELSON, P.C.

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18 Attorney for Plaintiff
STEFANY HAZELETT

Attorneys for Defendant
WAL-MART STORES, INC.

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20 IT IS SO ORDERED.

Dated: November 27, 2018.

21 No further
22 extensions will
23 be granted of the
24 dispositive motion
25 deadlines in this
26 matter.


UNITED STATES MAGISTRATE JUDGE