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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 JEANNIE BURLINGAME,  
11 Plaintiff,

12 vs.

13 CARSON CITY SCHOOL DISTRICT, LEE  
14 CONLEY, and JAN ALBERTSON,  
15 Defendants.

Case No. 3:17-CV-00499-MMD-VPC

**JOINT STIPULATION TO VACATE  
JOINT CASE MANAGEMENT  
CONFERENCE AND REPORT**

16 Plaintiff, JEANNIE BURLINGAME, and Defendants, CARSON CITY SCHOOL  
17 DISTRICT, LEE CONLEY, and JAN ALBERTSON (“the parties”), by and through their attorneys  
18 of record hereby stipulate and agree as follows:

19 A joint case management conference is scheduled for **Friday, January 5, 2018, at 10:00**  
20 **a.m.** A joint case management report is due seven (7) court days prior to the case management  
21 conference.

22 The parties have an Early Neutral Evaluation (“ENE”) set for **Thursday, March 1, 2018,**  
23 **at 9:00 a.m.** before the Hon. Robert McQuaid.

24 The parties have met and conferred and exchanged significant written discovery. Plaintiff  
25 has served a set of Requests for Production of Documents. The parties are responding to written  
26 discovery, considering settlement negotiations and preparing for the upcoming ENE. The parties  
27 have agreed that with all the ongoing discovery, settlement discussions, and preparations for the  
28 ENE, it would be best to vacate the joint case management conference and report until after the ENE

1 to conserve resources and attorney time. The parties have also agreed to notify the Court within five  
2 court days after the ENE to reschedule, at the Court's convenience, the joint case management  
3 conference.

4 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the parties'**  
5 **respective counsel, as follows:**

6 The joint case management conference and report shall be vacated until after the ENE and,  
7 if the ENE is not successful, the parties shall notify the Court on or before **March 8, 2018**, to  
8 reschedule the joint case management conference.

9  
10 DATED this 11<sup>th</sup> day of December, 2017.  
11 ERICKSON, THORPE & SWAINSTON

DATED this 11<sup>th</sup> day of December, 2017.  
LAW OFFICE OF TERRI KEYSER-COOPER

12  
13 By: /s/ Ann M. Alexander, Esq.  
14 ANN M. ALEXANDER, ESQ.  
15 NV Bar #7256  
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18 *Attorneys for Defendants*

By: /s/ Terri Keyser-Cooper, Esq.  
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Reno, Nevada 89512  
*Attorney for Plaintiff*

19  
20 **IT IS SO ORDERED:**

21   
22 UNITED STATES MAGISTRATE JUDGE

23  
24 DATED: December 12, 2017  
25  
26  
27  
28