

1 WILLIAM J. GEDDES
Nevada Bar No. 6984
2 KRISTEN R. GEDDES
Nevada Bar No. 9027
3 THE GEDDES LAW FIRM, P.C.
1575 Delucchi Lane, Suite 206
4 Reno, Nevada 89502
Phone: (775) 853-9455
5 Fax: (775) 299-5337
Email: Will@TheGeddesLawFirm.com
6 Email: Kristen@TheGeddesLawFirm.com
Attorney for Plaintiff Rebecca Ballinger

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 REBECCA BALLINGER,

11 Plaintiff,

12 vs.

13 PRIME HEALTHCARE SERVICES – RENO,
14 LLC, a Foreign Limited Liability Company,
dba St. Mary’s Regional Medical Center.

15 Defendant.

CASE NO.: 3:22-cv-00084-MMD-CLB

**STIPULATION AND
PROPOSED ORDER FOR
ENLARGEMENT OF TIME**

**For Plaintiff to File Response
To Defendant’s Partial Motion to Dismiss
Plaintiff’s Complaint**

(ECF 005)

(First Request)

19 The parties to this action, by and through their undersigned counsel of record hereby stipulate
20 that Plaintiff may have a two (2)-week extension of time, **through and including Tuesday, May 24,**
21 **2022,** to file her response to *Defendant’s Partial Motion to Dismiss Plaintiff’s Complaint* (ECF 005).
22 This is the first request for such an extension. The original deadline to file this opposition is Tuesday,
23 May 10, 2022. The reason Plaintiff needs additional time to file this brief is because her counsel has a
24 very congested calendar and was out of the office for much of last week, and he will need additional
25 time to prepare a responsive brief.

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1 This Stipulation is not offered for any dilatory or improper purpose.

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3 Dated this 9th day of May 2022.

Dated this 9th day of May 2022.

4 LITTLER MENDELSON


THE GEDDES LAW FIRM, P.C.

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6 *Electronic Signature Authorized*

7
8 By: /s/

KARYN M. TAYLOR, ESQ.,
Nevada Bar Number 6142
kmtaylor@littler.com
200 South Virginia Street, 8th Floor
Reno, NV 89501
Telephone: (775) 348-4888

*Attorneys for Defendant
Prime Healthcare Services – Reno, LLC*



WILLIAM J. GEDDES, ESQ.
Nevada Bar Number 6984
will@thegeddeslawfirm.com
1575 Delucchi Lane, Suite 206
Reno, Nevada 89502
(775) 853-9455

Attorney for Plaintiff Rebecca Ballinger

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14
15 **ORDER**

16 Dated: May 9, 2022

IT IS SO ORDERED

17
18
19 
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE


I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **May 9, 2022**, I caused to be served a copy of the foregoing *Stipulation and Proposed Order for Enlargement of Time for Plaintiff to File Response to Defendant's Partial Motion to Dismiss Plaintiff's Complaint (First Request)*, by electronic filing with the Court's Pacer e-filing system, addressed to:

KARYN M. TAYLOR, ESQ., Bar #6142
kmtaylor@littler.com
LUCAS W. MOLLECK, ESQ., Bar #14405
lmolleck@littler.com
LITTLER MENDELSON
200 South Virginia Street, 8th Floor
Reno, NV 89501
Telephone: (775) 348-4888
Facsimile: (775) 786-0127

*Attorneys for Defendant
Prime Healthcare Services – Reno, LLC*

Dated this 9th day of May 2022.

THE GEDDES LAW FIRM, P.C.



WILLIAM J. GEDDES, ESQ.
Nevada Bar Number 6984
The Geddes Law Firm, P.C.
1575 Delucchi Lane, Suite 206
Reno, Nevada 89502
(775) 853-9455
Attorney for Plaintiff Rebecca Ballinger