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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 REBECCA BALLINGER,

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

11 Plaintiff,

12 vs.

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

Defendant.

**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.

26 ///

27 ///

28 ///

1 This Stipulation is not offered for any dilatory or improper purpose.
2

3 Dated this 9th day of May 2022.

4 LITTLER MENDELSON

6 *Electronic Signature Authorized*

7 By: /s/
8 KARYN M. TAYLOR, ESQ.,
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12 *Attorneys for Defendant*
13 *Prime Healthcare Services – Reno, LLC*

Dated this 9th day of May 2022.

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17 *Attorney for Plaintiff Rebecca Ballinger*

18 **ORDER**

19 Dated: May 9, 2022 IT IS SO ORDERED

20 
21 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
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Prime Healthcare Services – Reno, LLC*

Dated this 9th day of May 2022.

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