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24 Attorneys for Defendants
 25 TEACHERS HEALTH TRUST AND MICHAEL STEINBRINK

26 UNITED STATES DISTRICT COURT
 27 DISTRICT OF NEVADA

28 DIANA GOODSELL, individually and on
 behalf of all those similarly situated; et al;

Plaintiffs,

v.

TEACHERS HEALTH TRUST, *et al.*

Defendants.

CASE NO.: 2:23-cv-01510-APG-DJA

Removed from State Court
 Case No. A-18-774418-B

**JOINT MOTION TO EXTEND
 DEFENDANT MICHAEL
 STEINBRINK'S RESPONSE DEADLINE
 TO THE SECOND AMENDED
 COMPLAINT**

[Proposed] Order Filed Concurrently

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Plaintiffs named and unnamed (collectively “Plaintiffs”) and Defendant Michael Steinbrink, through their respective counsel of record, states as follow:

1. This case was removed from the Eighth Judicial District Court, Clark County, Nevada on September 25, 2023 (ECF 1) and on October 3, 2023, the Davita Defendants filed an emergency motion to stay. (ECF 19).

2. On November 1, 2023, the Court granted the motion to stay the case, “for all purposes except resolution of the pending motions to compel and dismiss.” (ECF 47).

3. On December 12, 2023, the Court lifted the stay. (ECF 62).

4. Pursuant to Federal Rule of Civil Procedure 15, Mr. Steinbrink’s responsive deadline is currently December 26, 2023.

5. On December 21, 2023 counsel for Mr. Steinbrink and counsel for Plaintiffs agreed to extend the responsive pleading deadline by 21 days to January 16, 2024 in light of the holidays.

6. This is the first stipulation for extension of time for Mr. Steinbrink to respond to the Second Amended Complaint and is filed in accordance with Local Rule 7-1.

[SIGNATURE PAGE FOLLOWS]

1 Dated: December 27, 2023

HARTWELL THALACKER, LTD.
/s/Doreen Spears Hartwell
Doreen Spears Hartwell, Esq.
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151 north franklin street
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Chicago, IL 60606

*Attorneys for Defendants Teachers Health
Trust And Michael Steinbrink*

16 Dated: December 27, 2023

HAYES WAKAYAMA JUAN

/s/ Jack C. Juan
Jack C. Juan
5798 S. Durango Drive
Suite 105
Las Vegas, NV 89113

Gene J. Stonebarger
STONEBARGER LAW, APC
101 Parkshore Drive, Suite 100
Folsom, California 95630

22 **IT IS SO ORDERED.**

23 DATED: 1/4/2024

Attorneys for Plaintiffs

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25 _____
26 DANIEL J. ALBRECHTS
27 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court by using the court’s CM/ECF system on this 27th day of December, 2023.

/s/Doreen Spears Hartwell

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIANA GOODSSELL, individually and on
behalf of all those similarly situated; et al;

Plaintiffs,

v.

TEACHERS HEALTH TRUST, *et al.*

Defendants.

CASE NO.: 2:23-cv-01510-APG-DJA

Removed from State Court
Case No. A-18-774418-B

**[PROPOSED] ORDER GRANTING
JOINT MOTION TO EXTEND
DEFENDANT MICHAEL
STEINBRINK'S RESPONSE DEADLINE
TO THE SECOND AMENDED
COMPLAINT**

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IT IS SO ORDERED:

The Court, having read and considered the Joint Motion for Extension of Defendant Michael Steinbrink’s Response to Plaintiffs’ Second Amended Complaint, ORDERS the deadline continued to January 16, 2024.

DATED: _____, 2023

UNITED STATES DISTRICT COURT JUDGE
Hon. Andrew P. Gordon