

1 Jonathan A. Rich, Esq.  
 Nevada Bar No.: 15312  
 2 **COZEN O'CONNOR**  
 500 North Rainbow Blvd., Suite 300  
 3 Las Vegas, NV 89107  
 Telephone: (702) 470-2324  
 4 Facsimile: (702) 470-2359  
 Email: JARich@cozen.com

5 *Attorney for Defendant*  
 6 *Perry Johnson & Associates, Inc.*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10  
 11 RICHARD VETERE, individually and on behalf  
 of all others similarly situated,  
 12 Plaintiff,  
 13 v.  
 14 NORTHWELL HEALTH, INC. and PERRY  
 15 JOHNSON & ASSOCIATES, INC.,  
 16 Defendants.

CASE NO.: 2:23-cv-01900 -RFB-DJA

**STIPULATION TO EXTEND TIME FOR  
 DEFENDANTS PERRY JOHNSON &  
 ASSOCIATES, INC. AND NORTHWELL  
 HEALTH, INC. TO RESPOND TO  
 PLAINTIFF RICHARD VETERE'S  
 COMPLAINT**

**(FIRST REQUEST)**

17  
 18  
 19  
 20 Plaintiff Richard Vetere, individually and on behalf of all others similarly situated,  
 21 ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc.  
 22 ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under  
 23 Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint  
 24 in the above-captioned action (the "Complaint") until **March 1, 2024**.

25 Plaintiff filed the Complaint on November 17, 2023 and served PJ&A on November 21,  
 26 2023. Northwell executed a waiver of service that was entered on November 28, 2023.

27 On December 8, 2023, a Motion for Transfer of Actions to United States District Court for  
 28 the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C.

1 § 1407 (the “Motion”) was filed in the Judicial Panel on Multidistrict Litigation (“JPML”). *See In*  
2 *re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, Case MDL  
3 No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the potential consolidation  
4 and transfer of at least forty-five related putative class action complaints. The JPML heard oral  
5 arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related  
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is  
9 included as Appendix A. As nearly every party has agreed that centralization is proper, the primary  
10 question for the JPML is *where* to centralize the cases, not *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of  
12 time for this deadline. The parties respectfully submit that there is good cause for this extension and  
13 the requested extension is not for the purpose of delay.

14 ///

15 ///

16 IT IS SO STIPULATED.

17

18

19

20

21

22

23

24

25

26

27

28

1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

3 By: /s/ Alex L. Fugazzi  
4 Alex L. Fugazzi (NV Bar #9022)  
5 Aleem A. Dhalla (NV Bar #14188)  
6 3883 Howard Hughes Parkway, Ste 1100  
7 Las Vegas, NV 89169-5958  
8 Telephone: (702) 784-5200  
9 afugazzi@swlaw.com  
10 Adhalla@swlaw.com

11 William L. Roberts\*  
12 Kathryn E. Caldwell\*  
13 Andrew B. Cashmore\*  
14 ROPES & GRAY LLP  
15 Prudential Tower  
16 800 Boylston Street  
17 Boston, Massachusetts 02199-3600  
18 Phone: (617) 951-7000  
19 Fax: (617) 951-7050  
20 william.roberts@ropesgray.com  
21 kathryn.caldwell@ropesgray.com  
22 andrew.cashmore@ropesgray.com

23 Glen J. Dalakian II\*  
24 ROPES & GRAY LLP  
25 1211 Avenue of the Americas  
26 New York, New York 10036-8704  
27 Phone: (212) 596-9000  
28 Fax: (212) 596-9090  
glen.dalakian@ropesgray.com

*Counsel for Defendant Northwell  
Health, Inc.  
\*pro hac vice forthcoming*

Dated: January 26, 2024.

STRANCH, JENNINGS & GARVEY,  
PLLC

By: /s/ Nathan R. Ring  
Nathan R. Ring (NV Bar #12078)  
3100 W. Charleston Blvd, Suite 208  
Las Vegas, NV 89102  
Phone: (725) 235-9750  
nring@stranchlaw.com

Linda P. Nussbaum (*pro hac vice*)  
NUSSBAUM LAW GROUP, P.C.  
1133 Avenue of the Americas, 31st Floor  
New York, New York 10036-6710  
Phone: (917) 438-9189  
lnussbaum@nussbaumpc.com

*Counsel for Plaintiff and Putative Class*

Dated: January 26, 2024.

COZEN O'CONNOR

By: /s/ Jonathan A. Rich  
Jonathan A. Rich (NV Bar #15312)  
500 North Rainbow Blvd., Suite 300  
Las Vegas, NV 89107  
Phone: (702) 470-2324  
Fax: (702) 470-2359  
jarich@cozen.com

*Counsel for Defendant Perry Johnson &  
Associates, Inc.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Defendants shall have up to and including **March 1, 2024** to respond to Plaintiff's complaint.

**IT IS SO ORDERED.**

DATED: January 29, 2024.



---

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

Appendix A

Related Cases Filed Against Perry Johnson & Associates, Inc. & Northwell Health, Inc. as of  
January 24, 2024

1. *Abdaljalil v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00025 (D. Nev. filed Jan. 4, 2024)
2. *Belov et al v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08583 (E.D.N.Y. filed Nov. 17, 2023)
3. *Belov et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01925 (D. Nev. filed Nov. 20, 2023)
4. *Bishop et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 3:23-cv-00385 (S.D. Ohio filed Dec. 22, 2023)
5. *Brewster v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08627 (E.D.N.Y. filed Nov. 20, 2023)
6. *Brown v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10037 (E.D. Mich. filed Jan. 5, 2024)
7. *Carino et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-02090 (D. Nev. filed Dec. 19, 2023)
8. *Carter v. Cook County Health and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01866 (D. Nev. filed Nov. 13, 2023)
9. *Colon et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01910 (D. Nev. Filed Nov. 20, 2023)
10. *Cook v. Northwell Health, Inc. and Perry Johnson & Associates, No. 23-000859* (N.Y. Sup. Ct., Nassau County filed Nov. 30, 2023)
11. *Davis v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01932 (D. Nev. Filed Nov. 21, 2023)
12. *Faivre v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County Health*, No. 2:23-cv-01926 (D. Nev. filed Nov. 20, 2023)
13. *Gerber v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08467 (E.D.N.Y. filed Nov. 14, 2023)
14. *Gill v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01851 (D. Nev. filed Nov. 10, 2023)
15. *Green v. Perry Johnson & Associates, Inc.*, No. CVI-23-17247 (Toledo Municipal Court, Lucas County Ohio filed Dec. 12, 2023)
16. *Gregg v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01987 (D. Nev. filed Nov. 30, 2023)
17. *Heitzner v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 16119/2023 (N.Y. Sup. Ct., New York County filed Nov. 15, 2023)
18. *Hinda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-09445 (E.D.N.Y. filed Dec. 21, 2023)

- 1 19. *Horsley et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 1:23-cv-00835 (S.D. Ohio filed Dec. 21, 2023)
- 2
- 3 20. *Hvidsten et al. v. Northwell Health, Inc.*, No. 2:23-cv-08538-RPK-ARL (E.D.N.Y. filed Nov. 16, 2023)
- 4
- 5 21. *H.Z. et al v. North Kansas City Hospital Auxiliary, Perry Johnson & Associates, Inc., Perry Johnson & Associates Coding Holding, Inc., and Perry Johnson & Associates Staffing Holding, Inc.*, No. 24CY-CV00708 (Cir. Ct. of Clay County, Missouri filed Jan. 17, 2024)
- 6
- 7 22. *Jackson v. Board of Trustees of North Kansas City Hospital, Meritas Health Corporation and Perry Johnson & Associates, Inc.*, No. 24CY-CV00519 (Cir. Ct. of Clay County, Missouri filed Jan. 12, 2024)
- 8
- 9 23. *Jon v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10100 (E.D. Mich. filed Jan. 12, 2024)
- 10
- 11 24. *Kaufman v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01935 (D. Nev. filed Nov. 21, 2023)
- 12
- 13 25. *Kay v. Perry Johnson & Associates, Inc. and Bon Secours Mercy Health, Inc., d/b/a Mercy Health*, No. 2:24-cv-00115 (D. Nev. filed Jan. 16, 2024)
- 14
- 15 26. *Kimber v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09293 (Ill. Cir. Ct., Cook County filed Nov. 7, 2023)
- 16
- 17 27. *Kurtev et al v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01905 (D. Nev. filed Nov. 17, 2023)
- 18
- 19 28. *Jerome v. Northwell Health*, No. 2:23-cv-8624 (E.D.N.Y. filed Nov. 20, 2023)
- 20
- 21 29. *Levitt v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01892 (D. Nev. filed Nov. 16, 2023)
- 22
- 23 30. *Lowery v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01857 (D. Nev. filed Nov. 13, 2023)
- 24
- 25 31. *Marconi et al. v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08638 (E.D.N.Y. filed Nov. 21, 2023)
- 26
- 27 32. *Martin v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09558 (Ill. Cir. Ct., Cook County filed Jan. 19)
- 28
33. *Mayo et al. v. Northwell Health Inc. and Perry Johnson & Associates*, No. 2:23-cv-08517 (E.D.N.Y. filed Nov. 16, 2023)
34. *O'Neill et al v. Perry Johnson & Associates, Inc., and County of Cook, Illinois*, No. 2:23-cv-01964 (D. Nev. filed Nov. 28, 2023)
35. *O'Rourke v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01880 (D. Nev. filed Nov. 14, 2023)
36. *Rodriguez et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01874 (D. Nev. filed Nov. 14, 2023)

- 1 37. *Ruderman et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-  
2 02014 (D. Nev. filed Dec. 6, 2023)
- 3 38. *Sept et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01983 (D. Nev. Filed Nov. 30,  
4 2023)
- 5 39. *Shanahan et al. v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County*  
6 *Health*, No. 2:23-cv-01947 (D. Nev. filed Nov. 22, 2023)
- 7 40. *Slotchiver v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00155 (D.S.C. Filed Jan. 10,  
8 2024)
- 9 41. *Stone et al v. Salem Community Hospital and Perry Johnson & Associates, Inc.*, No. 4:23-cv-  
10 02421 (N.D. Ohio filed Dec. 20, 2023)
- 11 42. *Sullivan v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10098  
12 (E.D. Mich. filed Jan. 12, 2024)
- 13 43. *Tudda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 618932/2023 (N.Y.  
14 Sup. Ct., Nassau County filed Nov. 20, 2023)
- 15 44. *Vasquez v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08544-  
16 LDH-AYS (E.D.N.Y. filed Nov. 16, 2023)
- 17 45. *Vetere v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01900 (D.  
18 Nev. filed Nov. 17, 2023)
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28