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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA and
STATE OF NEVADA,

Plaintiffs,

v.

CREEKSIDE HOSPICE II, LLC, SKILLED
HEALTHCARE GROUP INC. and SKILLED
HEALTHCARE, LLC,

Defendants.

Case No.: 2:13-cv-00167-APG-PAL

UNITED STATES OF AMERICA, *ex rel.*
JOANNE CRETNEY-TSOSIE, *et al.*,

Plaintiffs,

v.

CREEKSIDE HOSPICE II, LLC, *et al.*,

Defendants.

UNITED STATES OF AMERICA, *ex rel.*
VENETA LEPERA,

Plaintiffs,

v.

SKILLED HEALTHCARE, LLC, *et al.*,

Defendants.

**UNITED STATES AND STATE OF NEVADA'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO AMEND PLEADINGS**

The United States and the State of Nevada respectfully move the Court for a 30 day extension of the deadline to amend pleadings pursuant to Fed. R. Civ. P. 15(a)(1), as set forth in the April 13, 2015 Scheduling Order (Dkt. No. 70). The defendants and relators do not oppose this request.

1 The amendments which the United States will make relate only to the dismissal of the
2 Medicaid claims and the correction of certain typographical errors. No new claims will be added.
3 The undersigned attorneys with primary responsibility to litigate this matter must seek authority
4 from the appropriate officials at the Department of Justice to make the intended amendments and
5 anticipate that this process will be completed within 30 days. Counsel for Creekside advised that
6 Creekside does not object to the extension of time to file an Amended Complaint based on the
7 understanding that the extension and Amended Complaint will not affect the current scheduling
8 order or the pending motion to dismiss. Creekside reserves the right to object to the Amended
9 Complaint.
10

11 For the foregoing reasons, the United States and Nevada respectfully request a 30 day
12 extension of the deadline to amend pleadings pursuant to Fed. R. Civ. P. 15(a)(1) until, and
13 including, July 27, 2015.
14

15 Dated: June 26, 2015
16

17 Respectfully submitted,

18 BENJAMIN C. MIZER
19 Principal Deputy Assistant Attorney General

20 DANIEL G. BOGDEN
21 United States Attorney
22 District of Nevada

23 By: /s/ Kavitha J. Babu

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By: /s/ Mark Kemberling
Chief Deputy Attorney General

Attorneys for the State of Nevada

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA


3 UNITED STATES OF AMERICA and)
4 STATE OF NEVADA,)
5)
6 Plaintiffs,)
7 v.)
8 CREEKSIDE HOSPICE II, LLC, SKILLED)
9 HEALTHCARE GROUP INC. and SKILLED)
HEALTHCARE, LLC,)
Defendants.)

Case No.: 2:13-cv-00167-APG-PAL

10 **[PROPOSED] ORDER**

11 Pursuant to the United States and the State of Nevada's Unopposed Motion for Extension of
12 Time to Amend Pleadings, the request for a 30 day extension is GRANTED and it is ORDERED
13 that the last day for the parties to amend pleadings pursuant to Fed. R. Civ. P. 15(a)(1) shall be July
14 27, 2015.
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18 DATED: July 1, 2015

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United States District Judge/
United States Magistrate Judge
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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on the persons shown, by the method shown, on the date shown.

CM/ECF

All counsel of record

Dated: June 26, 2015

/s/ Kavitha J. Babu
KAVITHA J. BABU

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