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18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20
21 UNITED STATES OF AMERICA, *ex rel.*,
Joshua Luke,
22
Plaintiff and Relator,
23 v.
24 HEALTHSOUTH CORPORATION,
25 HEALTHSOUTH OF HENDERSON, INC. and
KENNETH BOWMAN,
26
Defendants.

Case No.: 2:13-cv-01319-APG-VCF

**JOINT STIPULATION TO EXTEND
THE TIME FOR PARTIES TO FILE
PROPOSED SCHEDULING ORDER AND
JOINT OR SEPARATE STATEMENTS
REGARDING RELATOR'S MOTION TO
COMPEL**

(First Request)

1 Plaintiff-Relator Joshua Luke (“Plaintiff”), as relator in this action, and Defendants
2 HealthSouth Corporation and HealthSouth of Henderson, Inc. (collectively, “HealthSouth
3 Defendants”) and Defendant Kenneth Bowman (collectively, “Defendants”), by and through their
4 undersigned counsel, hereby stipulate and agree, subject to this Court’s approval, as follows:

5 1. Whereas, a hearing was held in front of Magistrate Ferenbach on February 27, 2019;

6 2. Whereas, after that hearing an order was entered staying the scheduling order and
7 ordering the parties to file a proposed scheduling order and a joint statement regarding the scope of
8 Relator’s discovery, or, to the extent the parties could not reach an agreement pertaining to the scope
9 of discovery, separate statements of their respective positions regarding the same (Dkt. #174);

10 3. Whereas, the Parties are continuing to exchange drafts in an attempt to narrow the
11 issues for the Court, the Parties ask to be given relief from this Court’s entry of the order requiring a
12 proposed schedule and discovery status report(s) until Wednesday, April 3, 2019.

13 This stipulation is made in good faith, is not interposed for delay, and is not filed for an
14 improper purpose. This is the first stipulation to extend the time for the Parties to file a proposed
15 scheduling order and discovery statements.

16 DATED this 27th day of March, 2019.

DATED this 27th day of March, 2019.

17 **PISANELLI BICE PLLC**

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18 /s/ James Pisanelli

/s/ Craig Delk

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21 DATED this 27th day of March, 2018.

22 **REED SMITH LLP**

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DATED this 27th day of March, 2019.

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DATED this 27th day of March, 2019.

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 3-28-2019

CASE NO.: 2:13-cv-01319-APG-VCF

