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A limited liability partnership formed in the State of Delaware

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14 *Attorneys for Defendants HealthSouth Corp.
And HealthSouth of Henderson, Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 UNITED STATES OF AMERICA, *ex rel.*,
19 Joshua Luke,

20 Plaintiff,

21 v.

22 HEALTHSOUTH CORPORATION, *et al.*

23 Defendants.
24

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

**STIPULATION TO EXTEND THE TIME
FOR DEFENDANTS TO RESPOND TO
RELATOR'S MOTION FOR
ATTORNEYS' FEES AND EXPENSES
AND TROUTMAN SANDERS LLP'S
PETITION FOR PAYMENT OF
ATTORNEYS' FEES**

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

5 1. Whereas, Plaintiff filed a Motion for Attorneys’ Fees and Expenses (Dkt. #243) on
6 December 13, 2019.

7 2. Whereas, Troutman Sanders LLP filed a Petition for Payment of Attorneys’ Fees
8 (Dkt. #242) on December 13, 2019.

9 3. Whereas, the deadline for Defendants to respond to Plaintiff’s Motion for Attorneys’
10 Fees and Expenses (Dkt. #243) and Troutman Sanders LLP’s Petition for Payment of Attorneys’
11 Fees (Dkt. #242) is currently December 27, 2019.

12 4. Whereas, Plaintiff has agreed to give Defendants until January 15, 2020 to respond
13 to Plaintiff’s Motion for Attorneys’ Fees and Expenses (Dkt. #243) and Troutman Sanders LLP’s
14 Petition for Payment of Attorneys’ Fees (Dkt. #242), and Troutman Sanders LLP does not object.

15 This stipulation is made in good faith, is not interposed for delay, and is not filed for an
16 improper purpose.

17 DATED this 24th day of December, 2019

18 **PISANELLI BICE, PLLC**

19 */s/ James S. Pisanelli*

20 JAMES J. PISANELLI

21 Nevada Bar No. 4027

22 400 S. 7th Street, Suite 300

23 Las Vegas, NV 89101

DATED this 24th day of December, 2019

**THORNDALL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER**

/s/ Philip Goodhart

PHILIP GOODHART

Nevada Bar No. 5332

1100 E. Bridger Avenue

Las Vegas, NV 89101

24 **IT IS SO ORDERED.**

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26 United States District Judge

27 Dated: December 26, 2019.

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DATED this 24th day of December, 2019

REED SMITH LLP

/s/ R. Jeffrey Layne

R. JEFFREY LANE

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*Attorneys for Defendants HealthSouth Corp.
And HealthSouth of Henderson, Inc.*

DATED this 24th day of December, 2019

LAW OFFICE OF MERRIL HIRSH

/s/ Merrill Hirsh

MERRIL HIRSH

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MORGAN VERKAMP LLC

/s/ Frederick M. Morgan

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Cincinnati, OH 45202

Attorneys for Relator Joshua Luke

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

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

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CERTIFICATE OF SERVICE

I certify that on December 24, 2019, a copy of this document was filed using the Court’s CM/ECF system. Copies of this document have been served by electronic means on all registered users of the Court’s CM/ECF system who have appeared in this case, including the Troutman Sanders LLP attorneys who previously served as counsel of record for Plaintiff-Relator Joshua Luke.

/s/ R. Jeffrey Layne
R. Jeffrey Layne