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22 *Counsel for Defendant*
23 *Intermountain Health Care, Inc.*

24 UNITED STATES DISTRICT COURT
25 DISTRICT OF NEVADA

26 MY HEALTH, INC., a Delaware corporation,
27
28 Plaintiff,
29
30 v.
31 INTERMOUNTAIN HEALTH CARE, INC., a
32 Utah corporation,
33
34 Defendant.

35 Case No. 2:15-cv-00073-MMD-CWH
36
37 **STIPULATION FOR THIRD**
38 **EXTENSION OF TIME TO RESPOND**
39
40 **(Third Request for Extension of this**
41 **Deadline; Third Overall Extension**
42 **Request)**
43
44 Current Response Deadline:
45 April 30, 2015

46 Plaintiff My Health, Inc. (“**My Health**”) and Defendant Intermountain Health Care, Inc.
47 (“**Intermountain**”) have stipulated to, and respectfully request that the Court enter an order
48 providing for, a 60-day extension of the deadline for Intermountain to respond to My Health’s
49 complaint from April 30, 2015 to June 29, 2015. This is the third stipulation and request for an
50 extension of this deadline and the third overall request for an extension in this case. The initial

1 response deadline was February 5, 2015. Pursuant to two earlier stipulations of the parties, the
2 Court entered two previous orders extending this deadline, first to March 16, 2015 (Dkt. 10) and
3 then to April 30, 2015 (Dkt. 21).

4 After the Court granted the first and second extensions the parties have actively pursued
5 good-faith negotiations to settle this dispute. Through counsel, the parties have discussed
6 settlement terms in a series of communications and conferences, and the parties are confident that
7 a final settlement can be reached before either party or the Court expends further substantial
8 resources on the litigation of this dispute. But the parties have been unable to finalize an
9 agreement before the existing April 30 response deadline due to scheduling conflicts and the need
10 for individuals within each party to review and approve settlement terms.

11 The parties' agreed-upon third extension promotes judicial economy and ultimately the
12 interests of justice by providing additional time to facilitate settlement before the parties and
13 Court devote additional resources to the litigation of this matter. The agreed-upon extension
14 should not unduly delay the litigation of this matter and, it is expected, should enable the parties
15 to efficiently resolve this matter out of court. Accordingly, a third extension of the deadline for
16 Intermountain to respond to My Health's complaint to June 29, 2015 is warranted.

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Dated: April 29, 2015

Respectfully Submitted,

**PIA ANDERSON DORIOUS REYNARD & MOSS, STOEL RIVES LLP
LLC**

/s/ Joseph Pia
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*Counsel for Defendant
Intermountain Health Care, Inc.*

IT IS SO ORDERED:


United States District Judge

DATED: April 29, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2015, I caused a true and correct copy of the foregoing
STIPULATION FOR THIRD EXTENSION OF TIME TO RESPOND to be served on the parties
to this matter via the Court’s CM/ECF system.

/s/Hunter Ferguson
Hunter O. Ferguson