

1 **STOEL RIVES LLP**

2 Michael B. Brown, Nevada Bar No. 6577
3 michael.brown@stoel.com
4 10008 SE River Street
5 Truckee, CA 96161
6 Tel: (530) 582-2282
7 Fax: (530) 582-2281

8 Joshua G. Gigger (Pro Hac Vice)
9 josh.gigger@stoel.com
10 Marc T. Rasich (Pro Hac Vice)
11 marc.rasich@stoel.com
12 201 South Main Street, Suite 1100
13 Salt Lake City, UT 84111
14 Tel: (801) 328-3131
15 Fax: (801) 578-6999

16 Hunter O. Ferguson (Pro Hac Vice)
17 hunter.ferguson@stoel.com
18 600 University Street, Suite 3600
19 Seattle, WA 98101
20 Tel: (206) 386-7514
21 Fax: (206) 386-7500

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 FOURTH**
38 **EXTENSION OF TIME TO RESPOND**
39
40 **(Fourth Request for Extension of this**
41 **Deadline; Fourth Overall Extension**
42 **Request)**
43
44 Current Response Deadline:
45 June 29, 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 an extension of the deadline for Intermountain to respond to My Health’s complaint
49 from June 29, 2015 to July 13, 2015. This is the fourth stipulation and request for an extension of
50 this deadline and the fourth overall request for an extension in this case. The initial response

1 deadline was February 12, 2015. Pursuant to three earlier stipulations of the parties, the Court
2 entered three previous orders extending this deadline, first to March 16, 2015 (Dkt. 11), then to
3 April 30, 2015 (Dkt. 21), and then to June 29, 2015. (Dkt. 26).

4 After the Court granted these extensions the parties have actively pursued good-faith
5 negotiations to settle this dispute. Through counsel, the parties have discussed settlement terms
6 in a series of communications and conferences. Although the parties have not been able to reach
7 a final settlement agreement yet, the parties remain confident that a final settlement can be
8 reached before the proposed extended deadline for Intermountain to file a response, and before
9 either party or the Court expends substantial resources on the litigation of this dispute. But the
10 parties have been unable to finalize an agreement before the existing June 29 response deadline
11 because of scheduling conflicts, the need to further discuss terms for resolving certain claims, and
12 the corresponding need for individuals within each party to review and approve settlement terms.

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

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Dated: June 19, 2015

Respectfully Submitted,

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

/s/ Joseph Pia
Joseph G. Pia (Pro Hac Vice)
joe.pia@padrm.com
William O. Kimball, NSBN 9301
bkimball@padrm.com
222 South Main Street, Suite 1830
Salt Lake City, Utah 84101
Telephone: (801) 350-9000
Fax: (801) 350-9010

Counsel for Plaintiff My Health, Inc.

/s/ Hunter Ferguson
Hunter O. Ferguson (Pro Hac Vice)
hunter.ferguson@stoel.com
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: (206) 386-7514
Fax: (206) 386-7500

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michael.brown@stoel.com
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Truckee, CA 96161
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Telephone: (801) 328-3131
Fax: (801) 578-6999

*Counsel for Defendant
Intermountain Health Care, Inc.*

IT IS SO ORDERED:



United States District Judge

DATED: June 22, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 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