1 JORDAN P. SCHNITZER, ESQ. Nevada Bar No. 10744 2 THE SCHNITZER LAW FIRM 9205 W. Russell Road, Suite 240 3 Las Vegas, Nevada 89148 Telephone: (702) 960-4050 4 Facsimile: (702) 960-4092 5 Jordan@TheSchnitzerLawFirm.com Attorney for Defendants, 6 ACCESS MEDICAL, LLC and ROBERT CLARK WOOD, II 7

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

NAUTILUS INSURANCE COMPANY,

Plaintiff,

Case No.: 2:15-CV-00321-JAD-BNW

VS.

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ACCESS MEDICAL, LLC; ROBERT CLARK WOOD, II; FLOURNOY MANAGEMENT, LLC; and DOES 1-10, inclusive,

Defendants.

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR
DEFENDANT'S ACCESS MEDICAL, LLC
AND ROBERT CLARK WOOD, II TO
RESPOND TO PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR SUMMARY
JUDGMENT FOR REIMBURSEMENT
AGAINST ACCESS MEDICAL, LLC AND
ROBERT CLARK WOOD, II [ECF 178] AND
PLAINTIFF'S DEADLINE TO FILE ITS
REPLY

Plaintiff, Nautilus Insurance Company ("Nautilus") by and through its counsel SELMAN BREITMAN LLP, and Access Medical, LLC, and Robert Clark Wood, II, (collectively the "Insureds"), by and through their counsel THE SCHNITZER LAW FIRM hereby submit the following Stipulation and Order extending the deadline for the Insureds to file its Response to Nautilus's Notice of Motion and Motion for Summary Judgment for Reimbursement against Access Medical, LLC and Robert Clark Wood, II ("Motion") [ECF 178].

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In light of the Motion being filed while the Insureds' counsel was on vacation, Nautilus 1 2 has extended a professional courtesy in agreeing to allow the Insureds an additional week to respond to the Motion. The Insureds response to the Motion will be due on May 4, 2022. 3 As a professional courtesy and consideration for Nautilus' counsel agreeing to allow the 4 Insureds an additional week to respond to the Motion, Nautilus shall have an additional week to 5 reply to the Insureds response. Nautilus' reply to response to the Motion will be due on May 25, 6 2022. 7 IT IS SO STIPULATED. 8 DATED: April 27, 2022. THE SCHNITZER LAW FIRM 9 By: /s/ Jordan P. Schnitzer, Esq. 10 JORDAN P. SCHNITZER Nevada Bar No. 10744 11 9205 W. Russell Road, Suite 240 Las Vegas, NV 89148 12 Attorney for Defendants, 13 ACCESS MEDICAL, LLC and ROBERT CLARK WOOD, II 14 DATED: April 27, 2022. SELMAN BREITMAN LLP 15 By: /s/ Samuel E. Lipsitz, Esq. 16

CASEY J. QUINN Nevada Bar No. 11248 LINDA WENDELL HSU (PRO HAC VICE) California Bar No. 162971 SAMUEL E. LIPSITZ (PRO HAC VICE) California Bar No. 331407 3993 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169-0961 Attorneys for Plaintiff NAUTILUS INSURANCE COMPANY

## **ORDER**

IT IS SO ORDERED.

DATED: April 28, 2022

UNITED STATES JUDGE

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