

1 DENNIS L. KENNEDY
 Nevada Bar No. 1462
 2 JOSEPH A. LIEBMAN
 Nevada Bar No. 10125
 3 JOSHUA P. GILMORE
 Nevada Bar No. 11576
 4 **BAILEY ❖ KENNEDY**
 8984 Spanish Ridge Avenue
 5 Las Vegas, Nevada 89148-1302
 Telephone: 702.562.8820
 6 Facsimile: 702.562.8821
 DKennedy@BaileyKennedy.com
 7 JLiebman@BaileyKennedy.com
 JGilmore@BaileyKennedy.com
 8

Attorneys for Defendants & Counterclaimant
 9 RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
 M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI
 10 R. SHAH, MD, LTD.; and RADAR
 MEDICAL GROUP, LLP dba UNIVERSITY
 11 URGENT CARE

12 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA
 13

14 ALLSTATE INSURANCE COMPANY,
 ALLSTATE PROPERTY & CASUALTY
 15 INSURANCE COMPANY, ALLSTATE
 INDEMNITY COMPANY, and ALLSTATE
 16 FIRE & CASUALTY INSURANCE
 COMPANY,

17 Plaintiffs,

18 vs.

19 RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
 20 M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI
 R. SHAH, MD, LTD.; and RADAR MEDICAL
 21 GROUP, LLP dba UNIVERSITY URGENT
 CARE, Does 1-100, and ROES 101-200,
 22

23 Defendants.

24 AND RELATED CLAIMS.
 25

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO
 EXTEND DEADLINES**

(First Request)

BAILEY ❖ KENNEDY
 8984 SPANISH RIDGE AVENUE
 LAS VEGAS, NEVADA 89148-1302
 702.562.8820

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of
7 record, stipulate and agree as follows:

8 1. On May 12, 2017, the Radar Parties filed their Motion to Compel Addressing the
9 Relevancy of Their Third Set of Requests for Production of Documents [ECF No. 146] (“Motion to
10 Compel”).

11 2. Following an extension of time to respond [ECF No. 154], on June 2, 2017, the
12 Allstate Parties filed their Response to the Motion to Compel [ECF No. 155].

13 3. The Radar Parties presently have until June 9, 2017 to file their Reply in Support of
14 their Motion to Compel.

15 4. On May 26, 2017, the Allstate Parties filed their Motion to Dismiss Amended
16 Counterclaims Pursuant to Fed. R. Civ. P. 12(b)(6) [ECF No. 153] (“Motion to Dismiss”).

17 5. The Radar Parties presently have until June 9, 2017 to file their Response to the
18 Motion to Dismiss.

19 6. Due to unforeseen circumstances and scheduling conflicts for the Radar Parties’
20 counsel, the Radar Parties shall now have up to and including June 16, 2017 to file their Response to
21 the Motion to Dismiss and up to and including June 23, 2017 to file their Reply in Support of their
22 Motion to Compel.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7. This is the first stipulation for an extension of time to file the Response to the Motion to Dismiss and Reply in Support of the Motion to Compel. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 8th day of June, 2017.

DATED this 8th day of June, 2017.

FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN SPILLANE
PLLC

BAILEY ♦ KENNEDY

By: /s/ Eron Z. Cannon
ERON Z. CANNON
701 Fifth Avenue, Suite 4750
Seattle, WA 98104

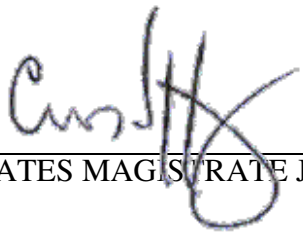
By: /s/ Joshua P. Gilmore
DENNIS L. KENNEDY
JOSEPH A. LIEBMAN
JOSHUA P. GILMORE
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

JARED P. GREEN
TODD W. BAXTER
McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP
8337 West Sunset Road, Suite 350
Las Vegas, NV 89113

Attorneys for Defendants & Counterclaimant

Attorneys for Plaintiffs/Counterdefendants

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: June 9, 2017