

1 DYLAN P. TODD
 Nevada Bar No. 10456
 2 TODD W. BAXTER
 Admitted Pro Hac Vice
 3 MCCORMICK, BARSTOW, SHEPPARD,
 WAYTE & CARRUTH LLP
 4 8337 West Sunset Road, Suite 350
 Las Vegas, Nevada 89113
 5 Telephone: (702) 949-1100
 Facsimile: (702) 949-1101
 6 *dylan.todd@mccormickbarstow.com*

7 ERON Z. CANNON
 Nevada Bar No. 8013
 8 FAIN ANDERSON VANDERHOEF
 ROSENDAHL O'HALLORAN SPILLANE PLLC
 9 701 5th Avenue #4750
 Seattle, Washington 98104
 10 Telephone: (206) 749-0094
eron@favros.com
 11 Attorneys for Plaintiffs/Counterdefendants

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 *****

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

18 Plaintiffs,

19 v.

20 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
 21 MD, RUSSELL J. SHAH, MD, LTD., DIPTI
 R. SHAH, MD, LTD., and RADAR
 22 MEDICAL GROUP, LLP dba UNIVERSITY
 URGENT CARE, DOES 1-100, and ROES
 23 101-200,

24 Defendants.

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE THE FILING
 DATE OF PLAINTIFFS' OPPOSITION
 TO DEFENDANTS' MOTION TO QUASH
 OR MODIFY SUBPOENAS AND FOR
 PROTECTIVE ORDER [ECF No. 227 and
 ECF No. 228]**

(First Request)

25 AND RELATED CLAIMS

28 2:15-cv-01786-APG-CWH

STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF PLAINTIFFS' OPPOSITION
 TO DEFENDANTS' MOTION TO QUASH OR MODIFY SUBPOENAS AND FOR PROTECTIVE ORDER [ECF
 No. 227 and ECF No. 228]

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

8 **RECITALS**

9 WHEREAS, on January 29, 2018, the Radar Parties filed and served their Motion To Quash
10 Or Modify Subpoenas And For Protective Order (Hearing Requested) [ECF No. 227 and ECF No.
11 228]; and

12 WHEREAS, the Allstate Parties’ Opposition to the Motion To Quash Or Modify Subpoenas
13 And For Protective Order is presently due on February 12, 2018.

14 **STIPULATION**

15 1. The date for the Allstate Parties to file and serve their Opposition to the Radar Parties’
16 Motion To Quash Or Modify Subpoenas And For Protective Order is continued from February 12,
17 2018 to February 19, 2018.

18 Good cause exists for the above continuance as the spouse of one of the Las Vegas counsel for
19 the Allstate Parties gave birth to a child on February 6, 2018, and counsel’s office requires additional
20 time to ensure resources are properly allocated to respond to the Motion.

21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 This is the first stipulation for an extension of time for the Allstate Parties to file their
2 Opposition to the Radar Parties' Motion To Quash Or Modify Subpoenas And For Protective Order.
3 This stipulation is made in good faith and not to delay the proceedings.

4 IT IS SO STIPULATED.

5 Dated: February 7, 2018

Dated: February 7, 2018

6 McCORMICK, BARSTOW, SHEPPARD,
7 WAYTE & CARRUTH LLP

BAILEY KENNEDY

8
9 By: /s/ Dylan P. Todd

By: /s/ Joshua P. Gilmore

10 DYLAN P. TODD, ESQ.
Nevada Bar No. 10456
11 TODD W. BAXTER, ESQ.
Admitted Pro Hac Vice
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113

DENNIS L. KENNEDY, ESQ.
Nevada Bar No. 1462
JOSEPH A. LIEBMAN, ESQ.
Nevada Bar No. 10125
JOSHUA P. GILMORE, ESQ.
Nevada Bar No. 11576
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148
*Attorneys for Defendants &
Counterclaimant*

12 ERON Z. CANNON, ESQ.
Nevada Bar No. 8013
13 FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN
SPILLANE, PLLC
14 701 Fifth Avenue, Suite 4750
Seattle, Washington 98104
15 *Attorneys for Plaintiffs/Counterdefendants*

16
17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this ___ February 8, 2018



20
21
22 UNITED STATES MAGISTRATE JUDGE

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

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2018, a true and correct copy of **STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO QUASH OR MODIFY SUBPOENAS AND FOR PROTECTIVE ORDER [ECF No. 227 and ECF No. 228]** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

Dennis L. Kennedy, Esq.
Joseph A. Liebman, Esq.
Joshua P. Gilmore, Esq.
BAILEY KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, NV 89148
Attorneys for Defendants

By /s/ Tricia A. Dorner
Tricia A. Dorner, an Employee of
MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

03246-01559 4965007.1