

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**

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

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

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,

**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]**

24 Defendants.

(Second Request)

25 AND RELATED CLAIMS
 26

27 2:15-cv-01786-APG-CWH

28 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 was originally due on February 12, 2018, and following the first request for
14 extension, is now presently due on February 19, 2018.

15 **STIPULATION**

16 1. The date for the Allstate Parties to file and serve their Opposition to the Radar Parties’
17 Motion To Quash Or Modify Subpoenas And For Protective Order is continued from February 19,
18 2018 to February 23, 2018.

19 Good cause exists for the above continuance as the spouse of one of the Las Vegas counsel for
20 the Allstate Parties gave birth to a child on February 6, 2018, and counsel’s office continues to require
21 additional time to ensure resources are properly allocated to respond to the Motion. Furthermore, due
22 to inadvertence, the original extended deadline of February 19, 2018 falls on a holiday when Allstate’s
23 counsel’s office is closed.

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1 This is the second 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 16, 2018

Dated: February 16, 2018

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

BAILEY KENNEDY

8 By: /s/ Dylan P. Todd

By: /s/ Joshua P. Gilmore

9 DYLAN P. TODD, ESQ.
10 Nevada Bar No. 10456
11 TODD W. BAXTER, ESQ.
12 Admitted Pro Hac Vice
13 8337 West Sunset Road, Suite 350
14 Las Vegas, Nevada 89113

15 ERON Z. CANNON, ESQ.
16 Nevada Bar No. 8013
17 FAIN ANDERSON VANDERHOEF
18 ROSENDAHL O'HALLORAN
19 SPILLANE, PLLC
20 701 Fifth Avenue, Suite 4750
21 Seattle, Washington 98104
22 Attorneys for Plaintiffs/Counterdefendants

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

ORDER

18 IT IS SO ORDERED.
19 DATED February 20, 2018


UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th 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/ Cheryl A. Schneider
Cheryl A. Schneider, an Employee of
MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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