

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

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

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 Defendants.

23  
 24 AND RELATED CLAIMS.  
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Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 DEFENDANTS' OPPOSITION TO  
 PLAINTIFFS' MOTION FOR  
 SANCTIONS PURSUANT TO FRCP 11**

**(Second Request)**

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, pursuant to an agreement reached on April 11, 2018, as follows:

8 1. On March 16, 2018, the Allstate Parties filed their Motion for Sanctions Pursuant to  
9 FRCP 11 [ECF No. 263] (the “Motion”);

10 2. Pursuant to the parties’ March 27, 2017 Stipulation [ECF No. 267], which was  
11 granted by the Court by Order dated March 28, 2018 [ECF No. 268], the Radar Parties presently  
12 have until April 13, 2018 to file their Opposition to the Motion;

13 3. In order to fully address the issues presented, and due to additional scheduling  
14 conflicts for the Radar Parties’ counsel, the Radar Parties shall now have up to and including April  
15 20, 2018 to file their Opposition to the Motion; and

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4. This is the second stipulation to extend the deadline to file the Opposition to the Motion. No further extension will be sought by the Radar Parties. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 13<sup>th</sup> day of April, 2018.  
McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

DATED this 13<sup>th</sup> day of April, 2018.  
BAILEY ♦ KENNEDY

By: /s/ Todd W. Baxter  
DYLAN P. TODD  
TODD W. BAXTER  
8337 West Sunset Road, Suite 350  
Las Vegas, NV 89113


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

*Attorneys for Defendants & Counterclaimant*

ERON Z. CANNON  
FAIN ANDERSON VANDERHOEF  
ROSENDAHL O'HALLORAN  
SPILLANE PLLC  
701 Fifth Avenue, Suite 4750  
Seattle, WA 98104

*Attorneys for Plaintiffs/Counterdefendants*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE  
Dated: April 20, 2018.