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 Attorney for Plaintiffs

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 7 UNITED STATES DISTRICT COURT  
 8 DISTRICT OF NEVADA

9 AMY VILELA, an individual;  
 10 JOZETTE FIGUEREDO, an individual;  
 AMY VILELA, as Special Administrator of the  
 11 Estate of SHALYNNE RAMOS,  
 12 Plaintiffs,

13 vs.

14 VALLEY HEALTH SYSTEM, LLC, d/b/a  
 15 CENTENNIAL HILLS HOSPITAL  
 MEDICAL CENTER, a Delaware Limited  
 16 Liability Company;  
 17 UNIVERSAL HEALTH SERVICES, INC., a  
 Delaware corporation; VALLEY HOSPITAL  
 18 MEDICAL CENTER, INC., a Nevada  
 Corporation; EMCARE, INC., a Delaware  
 19 Corporation; Tanya Netz PAC; Jill Mcatee, RN;  
 20 DOE Defendants I through X, inclusive; ROE  
 NURSES I through XX, inclusive; ZOE  
 21 HOSPITALS or OTHER MEDICAL  
 FACILITIES I through X; and ROE  
 22 CORPORATIONS I through X, inclusive.  
 23 Defendants.

Case No.: 2:16-cv-01503

**STIPULATION AND PROPOSED ORDER  
 TO EXTEND DUE DATES FOR  
 PLAINTIFFS' OPPOSITIONS TO  
 DEFENDANTS' VALLEY HEALTH  
 SYSTEM, LLC, D/B/A CENTENNIAL  
 HILLS HOSPITAL AND MEDICAL  
 CENTER'S AND TANYA NETZ PAC'S  
 AND EMCARE'S RENEWED MOTIONS  
 FOR PARTIAL SUMMARY JUDGMENT**

**FIRST REQUEST**

25 Plaintiffs, by and through their attorney of record, Casey D. Gish, Esq. of The Law Office  
 26 of Casey D. Gish and Defendant, VALLEY HEALTH SYSTEM, LLC, dba CENTENNIAL  
 27 HILLS HOSPITAL MEDICAL CENTER, by and through their attorney of record, Casey W.  
 28 Tyler, Esq. of Hall Prangle & Schoonveld, and Defendant, TANYA NETZ, PAC, by and through

1 her attorney of record, Todd Weiss, Esq. of John H. Cotton and Associates, hereby stipulate as  
2 follows:

3 (1) The due date for Plaintiffs' Oppositions to Defendants, VALLEY HEALTH  
4 SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and  
5 JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA  
6 Claim (Doc. No. 93) and Renewed Motion for Partial Summary Judgment on  
7 Plaintiffs' Jozette Figuerdo and Josiah McKinney claims (Doc. No. 95) and Motion for  
8 Partial Summary Judgment to Limit Plaintiffs' Hedonic Damage Claim to the  
9 \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94) was April 10,  
10 2020.

11 (2) The parties agreed that the due date for the Opposition to the Renewed Motion for  
12 Partial Summary Judgment (Doc. No. 93) should be extended to Tuesday, April 14,  
13 2020 and the due date for the Oppositions to the Renewed Motion for Partial Summary  
14 Judgment on Plaintiffs' Jozette Figuerdo and Josiah McKinney claims (Doc. No. 95)  
15 and Motion for Partial Summary Judgment to Limit Plaintiffs' Hedonic Damage  
16 Claim to the \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94)  
17 and the Joinders thereto should be extended to Friday, April 17, 2020.

18 (3) No parties will be prejudiced by this short extension. There is no pending trial date in  
19 this matter.

20 IT IS SO STIPULATED.

21 Dated this 14th day of April, 2020	Dated this 14th day of April, 2020
22 /s/ <i>Casey D. Gish</i>	/s/ <i>Craig D. Slater</i>
23 _____	_____
24 CASEY D. GISH, Esq. Nevada Bar No. 6657 THE LAW OFFICE OF CASEY D. GISH 5940 S. Rainbow Blvd. Las Vegas, NV 89118 Phone: (702) 583-5883 Fax: (702) 447-6845 Email: casey@gishlawfirm.com 25 <i>Co-counsel for Plaintiffs</i>	26 CRAIG D. SLATER, Esq. Nevada Bar No. 8667 LUH & ASSOCIATES 8987 W. Flamingo Rd., #100 Las Vegas, NV 89147 Phone: 702-367-8899 Fax: 702-384-8899 Email: cslater@luhlaw.com 27 <i>Co-counsel for Plaintiffs</i>

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Dated this 14th day of April, 2020	Dated this 14th day of April, 2020
<i>/s/ Casey W. Tyler</i>	<i>/s/ Todd Weiss</i>
Casey W. Tyler, Esq. Nevada Bar No. 9706 HALL PRANGLE & SCHOONVELD 1140 North Town Center Drive., #350 Las Vegas, NV 89144 Phone: 702-889-6400 Fax: 702-384-6025 Email: efile@hpslawlaw.com <i>Attorney for Defendant Valley Health System, LLC</i>	TODD WEISS, Esq. Nevada Bar No. 14130 JOHN H. COTTON AND ASSOCIATES 7900 West Sahara Ave., #200 Las Vegas, NV 89117 Phone: 702-832-5909 Fax: 702-832-5910 Email: TWeiss@jhcottonlaw.com <i>Attorneys for Defendant Tanya Netz, PAC and Emcare, Inc.</i>

**ORDER**

Pursuant to the terms of the foregoing stipulation, the Court orders as follows:

1. Good cause exists for the extension of the due date for Plaintiffs' Oppositions to Defendants, VALLEY HEALTH SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA Claim (Doc. No. 93) and Renewed Motion for Partial Summary Judgement on Plaintiffs' Jozette Figuerdo and Josiah McKinney claims (Doc. No. 95) and Motion for Partial Summary Judgement to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94) and the Joinders thereto.
2. The due date for the Oppositions are extended to April 14, 2020 for Defendants, VALLEY HEALTH SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA Claim (Doc. No. 93) and to April 17, 2020 for both the Renewed Motion for Partial Summary Judgement on Plaintiffs' Jozette Figuerdo and

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Josiah McKinney claims (Doc. No. 95) and the Motion for Partial Summary  
Judgement to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic  
Damage Cap Per NRS 41A.035 (Doc. No. 94) and any Joinders thereto.

IT IS SO ORDERED.



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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 15th day of April, 2020.

THE LAW OFFICE OF CASEY D. GISH  
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Phone (702) 583-5883

CERTIFICATE OF SERVICE

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

I attest that I served the document described as **STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATES FOR PLAINTIFFS’ OPPOSITIONS TO DEFENDANTS’ VALLEY HEALTH SYSTEM, LLC, D/B/A CENTENNIAL HILLS HOSPITAL AND MEDICAL CENTER’S AND TANYA NETZ PAC’S AND EMCARE’S RENEWED MOTIONS FOR PARTIAL SUMMARY JUDGMENT** on those parties/attorneys whose address appears below:

X  VIA ELECTRONIC SERVICE: in accordance with FRCP 5 through the CM/ECF electronic filing system. I am “readily familiar” with the firm’s practice of electronically serving documents.

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*Attorneys for Defendants Valley Health System, LLC  
d/b/a Centennial Hills Hospital Medical Center*

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*Co-counsel for Plaintiffs*

Executed on the 14<sup>th</sup> day of April, 2020.

*/s/ Casey D. Gish*

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An employee of THE LAW OFFICE OF  
CASEY D. GISH