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Attorneys for Defendant AFFORDABLE CARE, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BOSTON DENTAL GROUP, LLC, a Nevada limited liability company,

Plaintiff,

VS.

AFFORDABLE CARE, LLC, a North Carolina limited liability company,

Defendant.

AND RELATED COUNTERCLAIM

Case No.: 2:16-cv-01636-RFB-CWH

STIPULATION AND PROPOSED ORDER TO EXTEND THE PRETRIAL ORDER DEADLINE TWENTY-EIGHT (28) DAYS TO NOVEMBER 29, 2018

(EIGHTH REQUEST)

Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between Plaintiff/Counterclaim Defendant Boston Dental Group, LLC ("Boston Dental"), by and through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC ("Affordable Care"), by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum & Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the November 1, 2018 Joint Pretrial Order deadline, until November 29, 2018, for the purpose of allowing the parties to finalize a settlement agreement, as further set forth herein. This is the eighth stipulation for an extension of time to extend the Joint Pretrial Order deadline.

On October 5, 2018, this Court extended the Pretrial Order deadline to November 1, 2018 to allow the parties time to finalize a settlement agreement in principle. Since that time, the parties have finalized the settlement agreement and are awaiting signatures. In accordance with the terms of the agreement, the parties anticipate filing a stipulation of dismissal of the litigation shortly. Accordingly, the parties seek a brief twenty-eight (28) day extension of the Joint Pretrial Order deadline in order to execute the settlement agreement. The litigation of this matter will be best served by the proposed extension. There is good cause to grant the parties' eighth stipulation for extension of time because the parties only seek the extension to allow time to execute the settlement agreement. *See Fernandez v. N.V.*, Case No. 2011 WL 3957612 at *2 (Dist. Nev. Sept. 6, 2011) (granting motion for extension of time to file pretrial brief because parties engaged in settlement negotiations).

Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be extended for twenty-eight (28) days from November 1, 2018 to November 29, 2018.

IT IS SO STIPULATED.

1	DATED this 1st day of November, 2018	DATED this 1st day of November, 2018
	KOLESAR & LEATHAM	BORGHESE LEGAL, LTD.
2		
3	By /s/ Sharon E. Calhoun SCOTT R. COOK, ESQ.	By /s/Mark Borghese
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15	hannah.jurowicz@bfkn.com	
	Attornava for Defendant	
16	Attorneys for Defendant Affordable Care, LLC	
17		
18	<u>ORDER</u>	
19	IT IS SO ORDERED. /	
20	II IS SO ORDERED.	
21	Carolt	
22	UNITED STATES MAG STRATE JUDGE	
23	DATED:November 5, 2018	
24	DATED.	<u>-</u>
25		