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 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.

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

**STIPULATION AND PROPOSED
 ORDER TO EXTEND THE PRETRIAL
 ORDER DEADLINE TWENTY-EIGHT
 (28) DAYS TO JUNE 14, 2018**

(SECOND REQUEST)

AND RELATED COUNTERCLAIM

1 Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between
2 Plaintiff/Counterclaim Defendant Boston Dental Group, LLC (“Boston Dental”), by and
3 through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the
4 one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC (“Affordable Care”),
5 by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum &
6 Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the May 17, 2018
7 Joint Pretrial Order deadline, until June 14, 2018, for the purpose of allowing the parties to
8 finalize a settlement agreement in principle, as further set forth herein. This is the second
9 stipulation for extension of time to extend the Joint Pretrial Order deadline.

10 On April 24, 2018, this Court extended the Pretrial Order deadline to May 17, 2018 to
11 allow the parties time to reach a settlement agreement. Since that time, the parties have
12 successfully reached an agreement in principle and are working to finalize a settlement
13 agreement. The parties now seek a brief twenty-eight (28) day extension of the Joint Pretrial
14 Order deadline in order to finalize and execute the settlement agreement. The litigation of this
15 matter will be best served by the proposed extension. There is good cause to grant the parties’
16 second stipulation for extension of time because the parties only seek the extension to allow
17 time to finalize the settlement in principle. See Fernandez v. N.V., Case No. 2011 WL
18 3957612 at *2 (Dist. Nev. Sept. 6, 2011) (granting motion for extension of time to file pretrial
19 brief because parties engaged in settlement negotiations).

20 Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be
21 extended for twenty-eight (28) days from May 17, 2018 to June 14, 2018.

22
23 **IT IS SO STIPULATED.**

24 DATED this 17th day of May, 2018

DATED this 17th day of May, 2018

25 **KOLESAR & LEATHAM**

BORGHESE LEGAL, LTD.

26 By /s/ Sharon E. Calhoun

By /s/ Mark Borghese

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Attorneys for Plaintiff
Boston Dental Group, LLC

Attorneys for Defendant
Affordable Care, LLC

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 18th day of May, 2018.