1 2 3 4 5 6	VERONICA ARECHEDERRA HALL Nevada Bar No. 5855 CAYLA WITTY Nevada Bar No. 12897 LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 702.893.3383 FAX: 702.893.3789 Attorneys for Las Vegas Operations, LLC, d/b/a		
7	Life Care Center of Las Vegas		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	GODFREY O. MERE,	CASE NO. 2:17-cv-00698-JCM-NJK	
12	Plaintiff,	STIPULATION AND ORDER TO AMEND COMPLAINT AND CAPTION	
13	VS.		
14	LAS VEGAS OPERATIONS, LLC, d/b/a LIFE CARE CENTER OF LAS VEGAS,		
15	Defendant.		
16			
17	Plaintiff Godfrey O. Mere filed suit on March 9, 2017, ECF No. 1. On May 1, 2017,		
18	Defendant Las Vegas Operations, LLC, d/b/a Life Care Center of Las Vegas, filed its Partial		
19	Motion to Dismiss, ECF No. 7. A corrected image of Defendant's Partial Motion to Dismiss was		
20	filed May 5, 2017, ECF No. 10, which identified the proper name for Defendant.		
21	The parties' counsel agreed to file a stipulation and order to dismiss the Plaintiff's Third		
22	and Fourth Causes of Action in his Complaint, ECF No. 1, and to properly identify Defendant and		
23	amend the caption as such. However, due to technological issues, Defendant's counsel did not		
24	receive the proposed stipulation from Plaintiff's counsel. On May 15, 2017, Plaintiff's counsel		
25	instead filed a Non-Opposition to the Partial Motion to Dismiss, ECF No. 12, and an Amended		
26	Complaint, ECF No. 11.		
27	THEREFORE, the parties, by and through their respective counsels of record, hereby		
28	STIPULATE AND AGREE that Plaintiff's An	nended Complaint, ECF No. 11, be accepted as	

1	filed. Defendant shall have twenty-one (21) days from May 15, 2017 to file a responsive pleading		
2	2 to the Amended Complaint.		
3	IT IS FURTHER STIPULATED that Defendant's Partial Motion to Dismiss, ECF No. 7 /		
4	ECF No. 10, be DISMISSED AS MOOT.		
5	IT IS FURTHER STIPULATED that the caption in this suit shall be amended to read		
6	Godfrey O. Mere v. Las Vegas Operations, LLC, d/b/a Life Care Center of Las Vegas.		
7	7		
8	8DATED this 15th day of May, 2017DATED this 15th day of May, 2017		
9			
10	0 & SMITH LLP		
11	1		
12			
13	3 By <u>/s/ Cayla Witty</u> /s/ Guinness Ohazuruike VERONICA ARECHEDERRA HALL GUINNESS OHAZURUIKE		
14	4Nevada Bar No. 5855Nevada Bar No. 112316845 W. Charleston Plud. #A		
15	CAYLA WITTY6845 W. Charleston Blvd., #ANevada Bar No. 12897Las Vegas, NV 89117		
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17			
18	Attorneys for Defendant		
19			
20			
21	ORDER		
22	2		
23	3 IT IS SO ORDERED:		
24	4 Xerres C. Mahan		
25	UNITED STATES DISTRICT COURT JUDGE		
26	May 17, 2017		
27			
28	8		

4830-4126-3176.1

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