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11 Attorneys for Defendant/Cross-Claimant  
12 NAUTILUS INSURANCE COMPANY

13 UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA

16 ROBERT "SONNY" WOOD, an individual;  
ACCESS MEDICAL, LLC, a Delaware limited  
17 liability company,

18 Plaintiffs,

19 v.

20 NAUTILUS INSURANCE GROUP, a  
Delaware limited liability company, et al.,

21 Defendant.

23 NAUTILUS INSURANCE COMPANY,

24 Cross-Claimant,

25 v.  
26 ROBERT "SONNY" WOOD; ACCESS  
MEDICAL, LLC; FLOURNOY  
27 MANAGEMENT, LLC AND ROES 1-10,  
inclusive,

28 Counter-Defendants.

Case No. 2:17-CV-02393-MMD-DJA

**STIPULATION AND  
ORDER FOR EXTENSION OF  
DEADLINES TO MOVE FOR FEES AND  
COSTS ARISING FROM NAUTILUS'S  
DISCOVERY MOTIONS HEARD ON  
FEBRUARY 20, 2020**

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The parties hereto, by and through their undersigned counsel, stipulate for an extension of the deadline associated with Defendant Nautilus Insurance Company's ("Nautilus's") Request for Sanctions arising out of its Motion to Quash the Subpoena to the Cutler Law Firm, ECF No. 168 and its Motion for a Protective Order, ECF No. 184 (collectively "the Motions").

In the hearing on the Motions on February 20, the Court permitted Nautilus to file a motion to recover fees and costs related to the Motions within 14 days. The Court also required that the parties meet and confer on the fees and costs issue and amounts prior to Nautilus filing the motion.

The parties have begun the meet and confer process, but have not yet reached an agreement or an impasse. In light of that, and due to the current ongoing meet and confer communications, the parties request that the Court order:

1. Nautilus's motion for fees and costs, if necessary, is currently due on March 5, 2020 but that deadline is continued to March 19, 2020.
2. Access and Wood's opposition, if necessary, is currently due on March 19, 2020, but that deadline is continued to April 2, 2020.
3. Nautilus's reply, if any, is currently due March 26, 2020 but that deadline is continued to April 9, 2020.

**IT IS SO STIPULATED.**

DATED: March 5, 2020

SELMAN BREITMAN LLP

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DATED: March 5, 2020

KRAVITZ, SCHNITZER & JOHNSON, CHTD

By: /s/ Jordan P. Schnitzer  
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Attorneys for Defendants ACCESS MEDICAL,  
LLC and ROBERT CLARK WOOD, II

**IT IS SO ORDERED:**

Dated: March 6, 2020



Magistrate Judge Daniel J. Albregts

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of SELMAN BREITMAN LLP and, pursuant to Local Rule 5.1, service of the foregoing **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF DEADLINES TO MOVE FOR FEES AND COSTS ARISING FROM NAUTILUS'S DISCOVERY MOTIONS HEARD ON FEBRUARY 20, 2020** on this 5<sup>th</sup> day of March, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, as follows:

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*/s/ Pamela Smith*

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