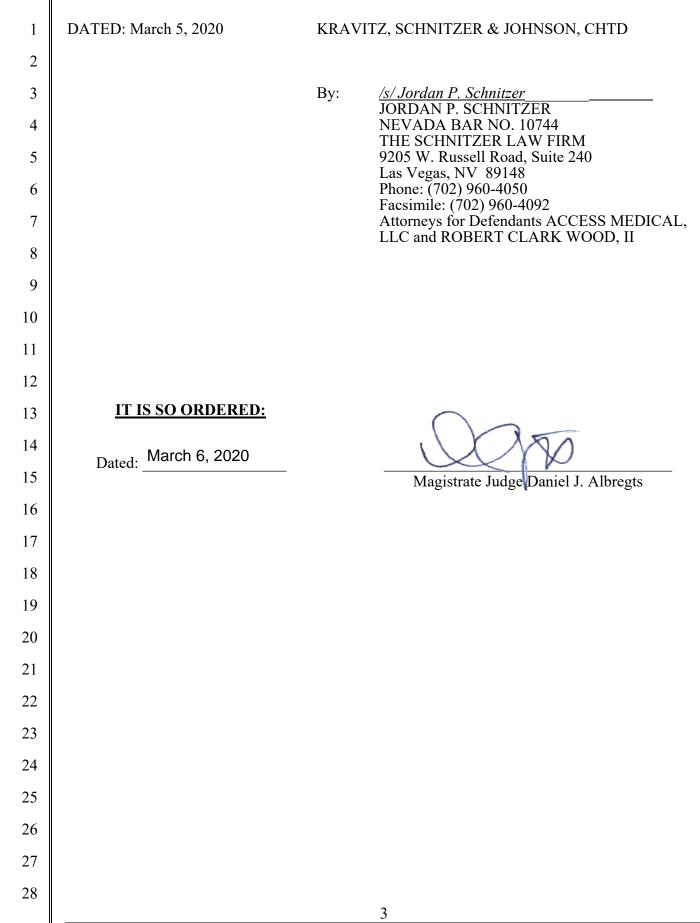
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	16 17 18	ROBERT "SONNY" WOOD, an individual; ACCESS MEDICAL, LLC, a Delaware limited liability company, Plaintiffs,	Case No. 2:17-CV-02393-MMD-DJA STIPULATION AND ORDER FOR EXTENSION OF DEADLINES TO MOVE FOR FEES AND
	19	v.	COSTS ARISING FROM NAUTILUS'S DISCOVERY MOTIONS HEARD ON
	20	NAUTILUS INSURANCE GROUP, a Delaware limited liability company, et al.,	FEBRUARY 20, 2020
	21	Defendant.	
	22		
	23	NAUTILUS INSURANCE COMPANY,	
	24	Cross-Claimant, v.	
	25 26	ROBERT "SONNY" WOOD; ACCESS MEDICAL, LLC; FLOURNOY MANAGEMENT, LLC AND ROES 1-10,	
	27	inclusive,	
	28	Counter-Defendants.	
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1	The parties hereto, by and through their undersigned counsel, stipulate for an extension of		
2	the deadline associated with Defendant Nautilus Insurance Company's ("Nautilus's") Request for		
3	Sanctions arising out of its Motion to Quash the Subpoena to the Cutler Law Firm, ECF No. 168		
4	and its Motion for a Protective Order, ECF No. 184 (collectively "the Motions").		
5	In the hearing on the Motions on February 20, the Court permitted Nautilus to file a motion		
6	to recover fees and costs related to the Motions within 14 days. The Court also required that the		
7	parties meet and confer on the fees and costs issue and amounts prior to Nautilus filing the motion.		
8	The parties have begun the meet and confer process, but have not yet reached an agreement		
9	or an impasse. In light of that, and due to the current ongoing meet and confer communications,		
10	the parties request that the Court order:		
11	1. Nautilus's motion for fees and costs, if necessary, is currently due on March 5, 2020		
12	but that deadline is continued to March 19, 2020.		
13	2. Access and Wood's opposition, if necessary, is currently due on March 19, 2020, but		
14	that deadline is continued to April 2, 2020.		
15	3. Nautilus's reply, if any, is currently due March 26, 2020 but that deadline is continued		
16	to April 9, 2020.		
17	IT IS SO STIPULATED.		
18	DATED: March 5, 2020 SELMAN BREITMAN LLP		
19	DATED. Match 5, 2020 SELMAN DREITMAN EEI		
20	By: /s/ Linda Wendell Hsu		
21	GIL GLANCZ NEVADA BAR NO. 9813		
22	LINDA WENDELL HSU (Pro Hac Vice) CALIFORNIA BAR NO. 162971		
23	PETER W. BLOOM (Pro Hac Vice) CALIFORNIA BAR NO. 313507		
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26	Attorneys for Defendant/Cross-Claimant NAUTILUS INSURANCE COMPANY		
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23-6394-1			

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1	CERTIFICATE OF SERVICE
2 3	I hereby certify that I am an employee of SELMAN BREITMAN LLP and, pursuant to
4	Local Rule 5.1, service of the foregoing STIPULATION AND [PROPOSED] ORDER FOR
5	EXTENSION OF DEADLINES TO MOVE FOR FEES AND COSTS ARISING FROM
6	NAUTILUS'S DISCOVERY MOTIONS HEARD ON FEBRUARY 20, 2020 on this 5 th day
7	of March, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-
8	service list, as follows:
9 10 11	Martin KravitzJordan P. SchnitzerL. Renee GreenTHE SCHNITZER LAW FIRMKRAVITZ, SCHNITZER & JOHNSON9205 W. Russell Road, Suite 2408985 S. Eastern Ave., Ste. 200Las Vegas, NV 89148
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13	rgreen@ksjattorneys.com Attorneys for Plaintiffs ROBERT SONNY
14	Attorneys for Plaintiffs ROBERT SONNY WOOD AND ACCESS MEDICAL, LLC
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16	
17	/s/ Pamela Smith
18	PAMELA SMITH An Employee of Selman Breitman LLP
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