

Selman Breitman LLP
ATTORNEYS AT LAW

1 GIL GLANCZ
NEVADA BAR NO. 9813
2 SELMAN BREITMAN LLP
3993 Howard Hughes Parkway, Suite 200
3 Las Vegas, NV 89169-0961
Telephone: 702.228.7717
4 Facsimile: 702.228.8824
Email: gglancz@selmanlaw.com

5 LINDA WENDELL HSU (*Pro Hac Vice*)
6 CALIFORNIA BAR NO. 162971
7 PETER W. BLOOM (*Pro Hac Vice*)
CALIFORNIA BAR NO. 313507
8 SELMAN BREITMAN LLP
33 New Montgomery, Sixth Floor
San Francisco, CA 94105
9 Telephone: 415.979.0400
Facsimile: 415.979.2099
10 Email: lhsu@selmanlaw.com
pbloom@selmanlaw.com

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.

22
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 (THIRD REQUEST) OF
DEADLINES TO MOVE FOR FEES AND
COSTS FROM NAUTILUS'S DISCOVERY
MOTIONS HEARD ON FEBRUARY 20,
2020**

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 are making progress in the meet and confer process, but have not yet reached
9 an agreement or an impasse. In light of that, and due to the current ongoing meet and confer
10 communications, the parties request that the Court order:

- 11 1. Nautilus's motion for fees and costs, if necessary, is currently due on April 2, 2020 but
12 that deadline is continued to April 16, 2020.
- 13 2. Access and Wood's opposition, if necessary, is currently due on April 16, 2020, but
14 that deadline is continued to April 30, 2020.
- 15 3. Nautilus's reply, if any, is currently due April 23, 2020 but that deadline is continued to
16 May 7, 2020.

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18 **IT IS SO STIPULATED.**

19
20 DATED: April 2, 2020

SELMAN BREITMAN LLP

21
22 By: /s/ Linda Wendell Hsu

GIL GLANCZ
NEVADA BAR NO. 9813
LINDA WENDELL HSU (Pro Hac Vice)
CALIFORNIA BAR NO. 162971
PETER W. BLOOM (Pro Hac Vice)
CALIFORNIA BAR NO. 313507
3993 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-0961
Phone: 415.979.2024
Facsimile: 702.228.8824
Attorneys for Defendant/Cross-Claimant
NAUTILUS INSURANCE COMPANY

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DATED: April 2, 2020

KRAVITZ, SCHNITZER & JOHNSON, CHTD

By: /s/ Jordan P. Schnitzer
JORDAN P. SCHNITZER
NEVADA BAR NO. 10744
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, NV 89148
Phone: (702) 960-4050
Facsimile: (702) 960-4092
Attorneys for Defendants ACCESS MEDICAL,
LLC and ROBERT CLARK WOOD, II

IT IS SO ORDERED:

Dated: April 3, 2020



Daniel J. Albregis
United States Magistrate Judge

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 (THIRD REQUEST) OF DEADLINES TO MOVE FOR FEES AND COSTS FROM NAUTILUS'S DISCOVERY MOTIONS HEARD ON FEBRUARY 20, 2020** on this 2nd day of April, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, as follows:

Martin Kravitz
L. Renee Green
KRAVITZ, SCHNITZER & JOHNSON
8985 s. Eastern Ave, Ste.200
Las Vegas, NV 89123
Phone: (702) 362-6666
Facsimile: (702) 362-2203
Email: mkravitz@ksjattorneys.com
rgreen@ksjattorneys.com

Jordan P. Schnitzer
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, NV 89148
Phone: (702) 960-4050
Facsimile: (702) 960-4092
Email: Jordan@theschnitzerlawfirm.com

Attorneys for Plaintiffs ROBERT "SONNY"
WOOD and ACCESS MEDICAL, LLC

Attorneys for Plaintiffs ROBERT "SONNY"
WOOD and ACCESS MEDICAL, LLC

/s/ Pamela Smith
PAMELA SMITH
An Employee of Selman Breitman LLP