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 6 ROBERT “SONNY” WOOD and  
 ACCESS MEDICAL, LLC  
 7

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 ROBERT “SONNY” WOOD, an individual;  
 ACCESS MEDICAL, LLC, a Delaware limited  
 liability company,

11  
 12 Plaintiff,

13 vs.

14 NAUTILUS INSURANCE COMPANY, an Arizona  
 15 corporation; and DOES I through X, inclusive; and  
 16 ROE CORPORATIONS I through X, inclusive,

17 Defendants.  
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Case No.: 2:17-cv-02393-MMD-VCF

**JOINT STIPULATION AND**  
~~**PROPOSED**~~ **ORDER FOR**  
**EXTENSION OF JOINT PRETRIAL**  
**ORDER DEADLINE (SECOND**  
**REQUEST)**

26 On March 22, 2022, the Court entered a minute order referring the case to Magistrate Judge  
 27 Daniel J. Albrechts to conduct a settlement conference (the “Order”). ECF No. 316. In the Order,  
 28 the Court further stated that “[i]f the parties do not settle, the Joint Pretrial Order is due within 30

1 days of the date the settlement conference is held.” *Id.* Pursuant to ECF No. 317, the Court  
2 scheduled a mandatory remote settlement conference for Monday, June 6, 2022, at 10:00 a.m. (the  
3 “Settlement Conference”). Based on the Order, the original deadline for the parties to file the Joint  
4 Pretrial Order was July 6, 2022.

5 The parties, along with their counsel, participated in the Settlement Conference with  
6 Magistrate Judge Daniel J. Albregts. As discussed in the Court’s minutes of proceedings, offers  
7 and counteroffers were exchanged at the Settlement Conference; however, “[a] settlement was not  
8 reached.” ECF No. 319. After the Settlement Conference, the Court recused itself and directed  
9 the clerk of court to randomly reassign another magistrate judge to this case. *Id.* The case was  
10 randomly reassigned to Magistrate Judge Cam Ferenbach for all further proceedings. ECF No.  
11 320.

12 This Court previously granted the parties an extension until July 27, 2022, to file the Joint  
13 Pretrial Order. ECF 323. In the time since the Settlement Conference, and the granting of the first  
14 extension, counsel for the parties have diligently conferred regarding, and began preparing, the  
15 Joint Pretrial Order consistent with the numerous requirements of Local Rule 16-3(b). Specifically,  
16 the current draft of the document circulated between the parties is approximately 55 pages long.

17 However, the parties are still in the process of conferring about, preparing, and finalizing  
18 the Joint Pretrial Order for the Court. Further, given the volume of documents involved in this  
19 matter, addressing objections, duplicative documents, and agreements as to evidence has been time  
20 consuming.

21 To provide the parties enough time to further confer regarding the matters required by  
22 Local Rule 16-3(b) and to adequately prepare the Joint Pretrial Order, the parties hereby stipulate  
23 – and respectfully request that the Court order – to continue the deadline to file the Joint Pretrial  
24 Order to August 12, 2022.

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1 This is the second stipulation for extension of time to file the Joint Pretrial Order. No other  
2 deadlines will be affected by this continuance. The parties are committed to completing and filing  
3 the Joint Pretrial Order by the date requested herein. Although this is the second request, the parties  
4 have been working diligently and amicably on the lengthy document.

5 **IT IS SO STIPULATED.**

6 DATED: July 27, 2022

THE SCHNITZER LAW FIRM

7 By: /s/ Jordan P. Schnitzer, Esq.

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11 *Attorneys for Defendants ACCESS MEDICAL, LLC and*  
12 *ROBERT CLARK WOOD, II*

13 DATED: July 27, 2022

SELMAN BREITMAN LLP

14 By: /s/ Samuel E. Lipsitz, Esq.

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20 *Attorneys for Defendant/Cross-Claimant*

21 *NAUTILUS INSURANCE COMPANY*

22 **IT IS SO ORDERED**

23  
24 Dated: 7-27-2022

25   
Magistrate Judge Cam Ferenbach

