

1 Joel E. Tasca, Esq.  
 Nevada Bar No. 14124  
 2 Maria A. Gall, Esq.  
 Nevada Bar No. 14200  
 3 Kyle E. Ewing, Esq.  
 Nevada Bar No. 14051  
 4 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 5 Las Vegas, Nevada 89135  
 Telephone: (702) 471-7000  
 6 Facsimile: (702) 471-7070  
 tasca@ballardspahr.com  
 7 gallm@ballardspahr.com  
 ewingk@ballardspahr.com  
 8

*Attorneys for Defendants Hygea  
 9 Holdings Corp., Manuel Iglesias,  
 Edward Moffly, Daniel T. McGowan,  
 10 Frank Kelly, Martha Mairena  
 Castillo, Lacy Loar, Glenn Marichi,  
 11 Keith Collins, Jack Mann, Joseph  
 Campanella, and Carl Rosenkrantz*

12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**

14 N5HYG, LLC and NEVADA 5, INC.,  
 15  
 Plaintiffs,  
 16  
 v.  
 17  
 18 HYGEA HOLDINGS CORP., MANUEL  
 IGELSIAS; EDWARD MOFFLY; DANIEL  
 19 T. MCGOWAN; FRANK KELLY;  
 MARTHA MAIRENA CASTILLO; LACY  
 20 LOAR; RICHARD WILLIAMS, ESQ.;  
 GLENN MARICHI, M.D.; KEITH  
 21 COLLINS, M.D.; JACK MANN, M.D.; the  
 22 ESTATE OF HOWARD SUSSMAN, M.D.;  
 JOSEPH CAMPANELLA; CARL  
 23 ROSENCRANTZ; and RAY GONZALEZ;  
 DOES 1-X; AND ROES 1-X,  
 24  
 Defendants.  
 25

Case No. 2:17-cv-02870-JCM-PAL

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 DEFENDANTS TO RESPOND TO  
 PLAINTIFFS' MOTION FOR LEAVE TO  
 FILE NOTICE OF SUPPLEMENTAL  
 AUTHORITY**

**(First Request)**

26  
 27 This Stipulation and Order relates to the briefing schedule for Plaintiffs  
 28 N5HYG, LLC's and Nevada 5, Inc.'s Motion for Leave to File Notice of Supplemental

1 Authority. ECF No. 74. Plaintiffs N5HYG, LLC and Nevada 5, Inc. and Defendants  
2 Hygea Holdings Corp., Manuel Iglesias, Edward Moffly, Daniel T. McGowan, Frank  
3 Kelly, Martha Mairena Castillo, Lacy Loar, Glenn Marrichi, Keith Collins, Jack  
4 Mann, Joseph Campanella, Carl Rosenkrantz, Richard L. Williams, and Ray  
5 Gonzalez (collectively, the “Parties”), by and through their undersigned counsel,  
6 hereby stipulate and agree that the deadline for Defendants’ Responses<sup>1</sup> to  
7 Plaintiffs’ Motion for Leave to File Notice of Supplemental Authority be extended  
8 (“Defendants’ Responses”). The Parties agree that Defendants’ Responses are  
9 currently due on May 29, 2018. The Parties further stipulate and agree that  
10 deadline for Defendants’ Responses be extended three (3) days to June 1, 2018.

11 This is the Parties’ first request to extend the deadline for Defendants  
12 Responses, and the Parties make this request in good faith and not for purposes of  
13 delay.

14 Dated: May 25, 2018

15 ALBRIGHT, STODDARD, WARNICK &  
16 ALBRIGHT

BALLARD SPAHR LLP

17 By: /s/ G. Mark Albright \_\_\_\_\_

17 By: /s/ Kyle A. Ewing \_\_\_\_\_

18 G. Mark Albright, Esq.  
19 Nevada Bar No. 1394  
20 D. Chris Albright, Esq.  
21 Nevada Bar No. 4904  
22 801 South Rancho Drive, Suite D-4  
23 Las Vegas, Nevada 89106

24 Joel E. Tasca, Esq.  
25 Nevada Bar No. 14124  
26 Maria A. Gall, Esq.  
27 Nevada Bar No. 14200  
28 Kyle A. Ewing, Esq.  
Nevada Bar No. 14051  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135

21 E. Powell Miller, Esq.  
(admitted pro hac vice)  
22 Christopher D. Kaye, Esq.  
(admitted pro hac vice)  
23 Richard L. Merpi II, Esq.  
(admitted pro hac vice)  
24 THE MILLER LAW FIRM, P.C.  
25 950 W. University Dr., Ste. 300  
26 Rochester, Michigan 48307

*Attorneys for Defendants Hygea  
Holdings Corp., Manuel Iglesias, Edward  
Moffly, Daniel T. McGowan, Frank  
Kelly, Martha Mairena Castillo, Lacy  
Loar, Glenn Marichi, Keith Collins, Jack  
Mann, Joseph Campanella, and Carl  
Rosenkrantz*

26 *Attorneys for Plaintiffs N5HYG, LLC  
and Nevada 5, Inc.*

27 \_\_\_\_\_  
28 <sup>1</sup> Defendant Ray Gonzalez, by and through his separate counsel, anticipates filing a  
separate Response from the other Defendants.

1 HOLLAND & HART LLP  
2 By: /s/ Patrick J. Reilly  
Patrick J. Reilly, Esq.  
3 Nevada Bar No. 6103  
Sydney R. Gambee, Esq.  
4 Nevada Bar No. 14201  
9555 Hillwood Drive, 2nd Floor  
5 Las Vegas, Nevada 89134

6 Jeffrey T. Kucera, Esq.  
(admitted pro hac vice)  
7 K&L GATES LLP  
200 South Biscayne Boulevard  
8 Miami, Florida 33131

9 Stavroula E. Lambrakopoulos, Esq.  
(admitted pro hac vice)  
10 Theodore L. Kornobis, Esq.  
(admitted pro hac vice)  
11 K&L GATES LLP  
1601 K Street, N.W.  
12 Washington, D.C. 20006-1600

13 *Attorneys for Defendant Ray Gonzalez*

RICHARD L. WILLIAMS  
By: /s/ Richard L. Williams, Esq.  
Richard L. Williams, Esq.  
8110 SW 78th Street  
Miami, FL 33143  
(786) 405-3312  
rlwilliams.law@gmail.com

*Appearing Pro Se*

16 **ORDER**

17 **IT IS SO ORDERED.** The deadline for Defendants' Responses to Plaintiffs'  
18 Motion for Leave to File Supplemental Authority shall be extended from May 29,  
19 2018, to June 1, 2018.

21   
22 James C. Mahan  
U.S. DISTRICT JUDGE

24 Dated: June 1, 2018