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13 **UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 JONATHAN SORELLE,
16 Plaintiffs,
17 vs.
18 KAREO INC.; and DOES 1 through 10,
19 Defendants.

Case No. 2:18-cv-00160-JCM-NJK

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT AND
CONTINUE OTHER DEADLINES
UNTIL
MEDIATION IS COMPLETE**

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22 Plaintiff Jonathan Sorelle (“Plaintiff”), by and through his counsel of record, and
23 Defendant Kareo, Inc. (“Kareo”), by and through its counsel of record, hereby stipulate as follows:

- 24 1. The parties are working cooperatively to arrange a mediation to occur in April
25 2018. They intend to exchange mediator lists by March 16, 2018.
26 2. Plaintiff filed his First Amended Complaint on February 26, 2018.
27 3. The deadline for Kareo to file a response to the First Amended Complaint is March
28 21, 2018, per the parties’ stipulation that was granted by the Court on February 20, 2018.

1 4. In light of the cooperative attempt at mediation, the parties agree that all efforts
2 should be focused on mediation rather than on costly procedural actions that may prove
3 unnecessary pending the outcome of mediation.

4 5. Plaintiff and Kareo have conferred and agree, and respectfully request that the
5 Court set the deadlines as follows:

- 6 a. Kareo’s time to respond to the First Amended Complaint is extended until one
7 week after the Mediation Completion Date set forth below;
- 8 b. The parties’ obligation to hold an initial discovery scheduling conference and/or set
9 applicable discovery deadlines shall be extended until thirty (30) days following
10 Kareo’s time to respond as set forth above in Paragraph 5(a); and
- 11 c. Mediation will be completed by May 31, 2018.

12
13 DATED this 16th day of March, 2018.

14 RICE REUTHER SULLIVAN & CARROLL,
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17 By: /s/ David A. Carroll
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ORDER

Having reviewed the foregoing and finding good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the foregoing
“Stipulation To Extend Time to Respond and Continue Other Deadlines Until Mediation is
Complete” is GRANTED in part.

In the event mediation does not successfully resolve this case, the parties shall file
a joint proposed discovery plan and scheduling order no later than June 14, 2018,
or 14 days after the completion of mediation, whichever comes first.

IT IS SO ORDERED.

Dated: March 19, 2018



UNITED STATES MAGISTRATE JUDGE