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A limited liability partnership formed in the State of Delaware

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Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and
11 *HMO Colorado Inc. d/b/a HMO Nevada*

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

14 SUNRISE HOSPITAL AND MEDICAL
15 CENTER, LLC

16 Plaintiff,

17 vs.

18 ROCKY MOUNTAIN HOSPITAL AND
MEDICAL SERVICE, INC. d/b/a ANTHEM
19 BLUE CROSS AND BLUE SHIELD; HMO
COLORADO INC. d/b/a HMO NEVADA

20 Defendants.

Case No.: 2:18-cv-00761-RFB-GWF

**STATUS REPORT AND STIPULATION
TO STAY DISCOVERY**

22 Plaintiff Sunrise Hospital and Medical Center, LLC (“Plaintiff”) and Defendants Rocky
23 Mountain Hospital and Medical Service, Inc. d/b/a Anthem Blue Cross and Blue Shield and HMO
24 Colorado Inc. d/b/a HMO Nevada (“Defendants”, and collectively with Plaintiff, the “Parties”) submit
25 the following Status Report and Stipulation to Stay Discovery:
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1 1. On March 5, 2019, the Parties appeared before the Court on Anthem’s Motion to
2 Dismiss Plaintiff’s Complaint. The Court denied Anthem’s Motion to Dismiss and ordered Plaintiff
3 to file an Amended Complaint on or by March 15, 2019. (Dkt. 40.)

4 2. At the March 5, 2019 hearing, the Parties and the Court discussed a potential stay of
5 discovery in order to allow the Parties to pursue early resolution of this matter. The Parties agreed to
6 report to the Court on whether they have reached an agreement concerning alternative dispute
7 resolution.

8 3. Accordingly, the Parties report that they have agreed to pursue private mediation. As
9 the Parties are in the preliminary stages of selecting a mediator and a mediation date, the Parties
10 presently request to stay discovery for fourteen (14) days up through and including March 29, 2019.
11 On or before March 29, 2019, the Parties will provide the Court with a status report concerning the
12 scheduling of the mediation and inform the Court of the Parties’ agreement as to an extension of the
13 stay of discovery pending mediation.

14 4. This is the Parties’ first request for a stay of discovery, and there is good cause for the
15 stay of discovery. A stay will allow the Parties to focus their efforts on early resolution in an efficient
16 manner and save the Parties’ time and expense of discovery. Moreover, as no trial in this matter has
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1 been set, the requested stay does not require a change to any trial date. The Parties jointly request the
2 stay. Neither Party to this lawsuit will be prejudiced by the stay.

3 IT IS SO AGREED AND STIPULATED:

4 Dated this 14th day of March, 2019

Dated this 14th day of March, 2019

5 Lapidus & Lapidus, PLC

REED SMITH LLP

6 By: /s/ Daniel C. Lapidus

By: /s/ Karen E. Vaysman

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Medical Service, Inc. d/b/a Anthem Blue Cross
and Blue Shield and HMO Colorado Inc. d/b/a
HMO Nevada*

15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 DATED: March 15, 2019

20 CASE NO.: 2:18-cv-00761-RFB-GWF
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