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

14 SUNRISE HOSPITAL AND MEDICAL
 15 CENTER, LLC

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

16 Plaintiff,

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY STAY**

17 vs.

(First Request)

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.

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 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 Stipulation and Order to Extend Discovery Stay:
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REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

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1 1. On March 14, 2019, the Parties submitted a Status Report and Stipulation to Stay
2 Discovery (the “Stipulation”) in which they reported the Parties’ agreement to pursue private
3 mediation and requested to stay discovery for fourteen (14) days to allow for the selection of a
4 mediator and mediation date. (Dkt. 45.) The Parties also stipulated to provide the Court with a status
5 report concerning the scheduling of the mediation and the Parties’ agreement as to an extension of the
6 stay of discovery pending mediation on or before March 29, 2019. (Dkt. 45.) The Court entered the
7 Stipulation and Order on March 15, 2019. (Dkt. 46.)

8 2. The Parties have exchanged proposed mediators and their efforts to select a mediator
9 and mediation date are ongoing. The Parties thus require additional time to complete the scheduling
10 of the mediation and, as such, agree and stipulate to extend the stay of discovery for an additional
11 fourteen (14) days up through and including April 12, 2019.

12 3. The Parties further agree and stipulate that, on or before April 12, 2019, the Parties will
13 provide the Court with a status report concerning the scheduling of the mediation and inform the Court
14 of the Parties’ agreement as to an extension of the stay of discovery pending mediation.

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

6 IT IS SO AGREED AND STIPULATED:

7 Dated this 29th day of March, 2019

Dated this 29th day of March, 2019

8 Lapidus & Lapidus, PLC

REED SMITH LLP

9 By: /s/ Daniel C. Lapidus

By: /s/ Karen E. Vaysman

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17 Center, LLC

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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

19 IT IS SO ORDERED:



20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: April 1, 2019

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