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7 *Attorneys for Defendants Sahara Outpatient*  
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 8 *Vegas, Inc.*

9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA

11 PAUL B. CANALE, M.D., an individual and  
 12 Alabama resident,

13 Plaintiff,

14 v.

15 SAHARA OUTPATIENT SURGERY CENTER,  
 LTD., a Nevada limited partnership;  
 16 SURGICARE OF LAS VEGAS, INC., a Nevada  
 corporation; LANCE HICKMAN, an individual  
 17 and Tennessee resident; DOES I through X; ROE  
 CORPORATIONS I through X, inclusive,

18 Defendants.

Case No. 2:18-cv-01020-GMN-VCF

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR SAHARA  
 OUTPATIENT SURGERY CENTER,  
 LTD. AND SURGICARE OF LAS  
 VEGAS, INC.’S REPLY IN SUPPORT  
 OF THE MOTION TO DISMISS [ECF  
 NO. 6]**

**[FIRST REQUEST]**

19  
 20 Plaintiff Paul B. Canale, M.D. (“Plaintiff”), together with Defendants Sahara Outpatient  
 21 Surgery Center, Ltd. and Surgicare of Las Vegas, Inc. (collectively, the “Surgery Center Parties”),  
 22 by and through their respective attorneys of records, stipulate and agree as follows:

- 23 1. On June 19, 2018, the Surgery Center Parties filed and served their Motion to Dismiss  
 24 [ECF No. 6].  
 25 2. Dr. Canale filed his Opposition to the Motion to Dismiss on July 10, 2018 [ECF No.  
 26 12].<sup>1</sup>

27  
 28 <sup>1</sup> Dr. Canale’s deadline within which to file his Opposition was extended by the parties’ agreement and approved  
 by the Court on June 30, 2018. (See ECF No. 9.)

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1 3. The Surgery Center Parties' reply in support of the Motion to Dismiss is currently due  
2 on July 17, 2018.

3 4. The parties stipulate and agree that the date for the Surgery Center Parties' reply  
4 deadline shall be continued from July 17, 2018 to July 24, 2018 as a professional courtesy to the  
5 Surgery Center Parties' counsel.<sup>2</sup>

6 5. This is the first stipulation for an extension of time for the Surgery Center Parties to  
7 file their reply in support of the Motion to Dismiss. This stipulation is made in good faith and not to  
8 delay the proceedings.

9 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

10 DATED this 17<sup>th</sup> day of July, 2018.

DATED this 17<sup>th</sup> day of July, 2018.

11 ERICKSON & WHITAKER PC

BAILEY ♦ KENNEDY

12  
13 By: /s/ Brian C. Whitaker  
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18 *Attorneys for Plaintiff Paul B. Canale, M.D.*

*Attorneys for Defendants Sahara Outpatient  
Surgery Center, Ltd. and Surgicare of Las  
Vegas, Inc.*

19 **IT IS SO ORDERED.**

20 DATED this 17 day of July, 2018.

21   
22 \_\_\_\_\_  
23 Gloria M. Navarro, Chief Judge  
24 United States District Court  
25  
26

27 <sup>2</sup> The Surgery Center Parties originally requested a two-week extension of their reply deadline and understand, at  
28 the time of this filing, that Dr. Canale is still considering the Surgery Center Parties' request for an additional week. If  
parties subsequently agree to extend the Surgery Center Parties' reply deadline to July 31, 2018, they will file a second  
stipulation and order reflecting the same.