1 2 3 4 5	DAVID J. MERRILL Nevada Bar No. 6060 DAVID J. MERRILL, P.C. 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 Telephone: (702) 566-1935 E-mail: david@djmerrillpc.com Attorney for Defendant Lance Hickman	
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7 8		DISTRICT COURT OF NEVADA
9	PAUL B. CANALE, M.D., an individual and Alabama resident,	2:18-CV-01020-GMN-(VCF)
10 11	Plaintiff,	Stipulation and Order to Extend Time to File Response to the Complaint
12	vs.	(First Request)
13	SAHARA OUTPATIENT SURGERY CENTER, LTD., a Nevada limited part-	
14	nership; ŚURGICARE OF LAS VEĜAS, INC., a Nevada corporation; LANCE HICKMAN, an individual and Tennes-	
15	see resident; DOES I through X; ROE CORPORATIONS I through X, inclu-	
16	sive,	
17	Defendants.	
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In accordance with LR 7-1(a), the plaintiff, Paul B. Canale, M.D., and defendant Lance Hickman, stipulate as follows:

1. On April 17, 2018, Dr. Canale filed a complaint in the Eighth Judicial District Court. (ECF No. 1-2). Defendants Sahara Outpatient Surgery Center, Ltd. and Surgicare of Las Vegas, Inc. removed the action to this Court on June 5, 2018. (ECF No. 1.) Dr. Canale served Hickman with a copy of the summons and complaint on September 1, 2018. (ECF No. 23). Under Fed. R. Civ. P. 12(1)(a)(1) and 6(a)(1)(C), Hickman has up to and including September 24, 2018, to file a response to the complaint.

1 2. Because counsel for Hickman was out-of-state, he requested, and D 2 Canale's counsel agreed, to a brief extension until Friday, September 28, 2018. 3 3. This is the first stipulation for an extension of time to file a response to the complaint. 4 the complaint. 5 4. The parties have agreed to this extension for good cause and not so for the purpose of delay. 7 5. Accordingly, the parties stipulate that Hickman shall have up to ar including September 28, 2018, to file a response to the complaint. 9 Dated this 24th day of September 2018. 10 Erickson & Whitaker PC David J. Merrill, P.C. 11 By: <u>/s/ Brian C. Whitaker</u> Brian C. Whitaker PC Bavid J. Merrill 13 1349 Galleria Drive, Suite 200 Henderson, Nevada 89014 (702) 433-9696 By: <u>/s/ David J. Merrill</u> David J. Merrill 14 (702) 433-9696 Attorney for Plaintiff 16 It is so ordered: 17 It is so ordered: 18 It is so ordered: 20 United States Magistrate	e to ely
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