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7 *Attorneys for Defendants Sahara Outpatient*
Surgery Center, Ltd.; and Surgicare of Las
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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
 and Tennessee resident; DOES I through X; ROE
 17 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. TO RESPOND TO
 COMPLAINT**

(First Request)

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 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 5, 2018, the Surgery Center Parties filed their Petition for Removal,
 24 removing this case from state to federal court [Dkt. #1].
 25 2. The Surgery Center Parties did not file a response to the Complaint prior to removal.
 26 Therefore, pursuant to Fed. R. Civ. P. 81(c)(2)(C), the Surgery Center Parties’ response to Plaintiff’s
 27 Complaint is currently due June 12, 2018.
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3. The parties stipulate and agree that the date for the Surgery Center Parties' response to Plaintiff's Complaint shall be continued from June 12, 2018 to June 19, 2018.

4. Additional time is needed for the Surgery Center Parties' counsel to confer with the Surgery Center Parties regarding Plaintiff's claims and to prepare a response to the Complaint.

5. This is the first stipulation for an extension of time for the Surgery Center Parties to file their responsive pleading to Plaintiff's Complaint. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 12th day of June, 2018.

DATED this 12th day of June, 2018.

WOODS ERICKSON & WHITAKER LLP

BAILEY ♦ KENNEDY

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

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

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2018