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*Paul B. Canale, M.D.*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

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

**CASE: 2:18-CV-01020-GMN-VCF**

12 vs.

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

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR PAUL B.  
CANALE, M.D. TO RESPOND TO  
MOTION TO DISMISS**

(First Request)

18  
19 Plaintiff, PAUL B. CANALE, M.D., and Defendants, SAHARA OUTPATIENT SURGERY  
20 CENTER, LTD. and SURGICARE OF LAS VEGAS, INC. (hereinafter “Surgery Center Parties”), by  
21 and through their counsel of record, stipulate and agree as follows:

- 22 1. On June 19, 2018, Surgery Center Parties filed and served their Motion to Dismiss;
- 23 2. The parties stipulate and agree that the date for Plaintiff to oppose Surgery Center  
24 Parties’ Motion shall be continued from July 3, 2018 to July 10, 2018.
- 25 3. Additional time is needed for counsel to confer and review exhibits with Plaintiff to  
26 respond to Surgery Center Parties’ Motion.
- 27 4. This is the first stipulation for an extension of time for Plaintiff to respond to Surgery  
28 Center Parties’ Motion. The stipulation is made in good faith and not to delay the proceedings.



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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 29<sup>th</sup> day of June, 2018

ERICKSON & WHITAKER PC

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


DATED this 29<sup>th</sup> day of June, 2018

BAILEY KENNEDY

By: /s/ Andrea M. Champion  
JOSHUA M. DICKEY  
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ANDREA M. CHAMPION  
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*Attorneys for Defendants Sahara Outpatient  
Surgery Center, Ltd. and Surgicare of Las Vegas,  
Inc.*

IT IS SO ORDERED.

DATED this 30 day of June, 2018.

  
\_\_\_\_\_  
Gloria M. Navarro, Chief Judge  
United States District Court