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17 Attorneys for Defendants

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 NAVAJO HEALTH FOUNDATION – SAGE
21 MEMORIAL HOSPITAL, INC. (doing
22 business as “Sage Memorial Hospital”); an
23 Arizona non-profit corporation,

24 Plaintiff,

25 v.

26 RAZAGHI DEVELOPMENT COMPANY,
27 LLC; a Nevada limited liability company
28 (doing business as “Razaghi Healthcare”), et
al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF’S MOTION
TO COMPEL [ECF # 98]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED that Defendants shall have a short three-day extension of time, up to and including **October 16, 2020**, to answer or respond to Plaintiff’s Motion to Compel Razaghi Healthcare to Produce Documents (ECF No. 98). The parties have so stipulated due to defense counsel’s current case load, which includes but is not limited to, extensive

1 pleading and discovery practice, including attempts to confer regarding third-party requests for
2 information, in the instant case as well as complex and demanding discovery in unrelated matters.
3 The additional time requested herein will permit counsel for Defendants to meet other case
4 commitments while addressing Plaintiff's Motion to Compel (ECF No. 98). This is the first request
5 to extend this deadline.

6 RESPECTFULLY SUBMITTED this 12th day of October 2020.

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8 FISHER & PHILLIPS LLP

PAUL PADDA LAW, PLLC

9 By /s/ Kris Leonhardt
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By /s/ Paul S. Padda (with permission)
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15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 Dated: October 13, 2020
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