1 2	Jesse Sbaih & Associates, Ltd. Jesse M. Sbaih (#7898) Ines Olevic-Saleh (#11431)	
3	The District at Green Valley Ranch 170 South Green Valley Parkway, Suite 280 Henderson, Nevada 89012	
4 5	Tel (702) 896-2529 Fax (702) 896-0529 Email: jsbaih@sbaihlaw.com	
6	Sonya A. Rao ( <i>pro hac vice</i> )	
7 8	sonya.rao@morganverkamp.com MORGAN VERKAMP LLC 35 East Seventh Street, Suite 600 Cincinnati, OH 45202	
9	Telephone: 513.651.4400 Facsimile: 513.651.4405	
10	Attorneys for Plaintiff-Relator	
11	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
12 13	DISTRICT	
13	UNITED STATES OF AMERICA, <i>ex rel.</i> ,	Case No.: 2:19-cv-01560-JAD-VCF
15	TALI ARIK, M.D.,	
16	Plaintiff, v.	ORDER TO EXTEND TIME TO FILE RELATOR'S THIRD AMENDED COMPLAINT
17	DVH HOSPITAL ALLIANCE, LLC, d/b/a, DESERT VIEW HOSPITAL; VALLEY	(First Request)
18 19	HEALTH SYSTEM LLC; UNIVERSAL HEALTH SERVICES, INC.; VISTA HEALTH	(Thist Request)
20	MIRZA, M.D. P.C. d/b/a VISTA HEALTH; and IRFAN MIRZA, M.D.	
21	Defendants.	
22		
23		
24	Defendants (i.e., DVH Hospital Alliance, LLC, d/b/a Desert View Hospital; Vista Health;	
25	and Dr. Irfan Mirza) and relator Tali Arik, M.D. ("Relator")—collectively, the "Parties"—hereby	
26	stipulate and agree to an extension of the deadline to file a Third Amended Complaint ("TAC"). Th	
27	Parties also set forth a stipulated briefing schedule related to the TAC. In support of this Stipulation	
28	the Parties assert the following:	

1

Relator recently retained Morgan Verkamp LLC as additional counsel in this matter,
 and, on April 19, 2021, attorney Sonya A. Rao of that firm was granted permission to practice in this
 District *pro hac vice*. (Doc. 98.)

2. Soon thereafter, on May 4, 2021, this Court issued an order that: granted Defendants'
motions to dismiss Relator's Second Amended Complaint (Docs. 69, 70, 72); dismissed Relator's
first and second causes of action without prejudice;<sup>1</sup> and permitted Relator to file a TAC by May 17,
2021. (Doc. 100.)

3. To allow Relator's new counsel sufficient time to familiarize herself with this matter,
and to accommodate counsel's obligations in other matters, the Parties agree to extend the deadline
for Relator to file his TAC by 15 days, i.e., through June 1, 2021. This is the Parties' first request
for such an extension, which is made in good faith and not for the purpose of delay.

12 6. The Parties also agree to the following extended briefing schedule relating to the
13 TAC, which accommodates the Parties' case deadlines in other matters:

- a. Defendants' deadline to file their renewed motion(s) to dismiss Relator's TAC shall
  be June 29, 2021;
- b. Relator's deadline to file his opposition(s) to Defendants' renewed motion(s) to
  dismiss shall be July 27, 2021; and

c. Defendants' deadline to file their reply (or replies) to Relator's opposition(s) shall be
August 10, 2021.

Accordingly, for the reasons set forth above, the Parties respectfully request that the Court: (1) extend the deadline to file a TAC, up to and including June 1, 2021; and (2) adopt the abovedescribed briefing schedule relating to the TAC.

23

24

25

26

 <sup>&</sup>lt;sup>1</sup> Relator's conspiracy claim was dismissed with prejudice. Because that claim was the only one asserted against defendants Valley Health System LLC, d/b/a The Valley Health System and Universal Services, Inc., those defendants are no longer parties to this action.

1	Respectfully submitted,	
2	DATED this 11th day of May, 2021.	DATED this 11th day of May, 2021.
3	/s/ Sonya A. Rao	/s/Gregory R. Jones
4	JESSE SBAIH & ASSOCIATES, LTD.	McDERMOTT WILL & EMERY LLP
5	Jesse M. Sbaih (#7898) Ines Olevic-Saleh (#11431) The District at Green Valley Ranch	Thomas A. Ryan (admitted <i>pro hac vice</i> ) Gregory R. Jones (admitted <i>pro hac vice</i> ) 2049 Century Park East, Suite 3200
6	170 South Green Valley Parkway, Suite 280	Los Angeles, CA 90067-3206
7	Henderson, Nevada 89012	JOHN H COTTON & ASSOCIATES, LTD.
8	MORGAN VERKAMP LLC SONYA A. RAO ( <i>pro hac vice</i> ) 35 East Seventh St., Suite 600	John H. Cotton (Nevada Bar No. 005268) Katherine L. Turpen (Nevada Bar. No. 008911) 7900 W. Sahara Ave., Suite 200
9	Cincinnati, OH 45202	Las Vegas, Nevada 89117
10	Attorneys for Plaintiff-Relator	Attorneys for Defendants DVH Hospital
11		Alliance, LLC
12		/s/ Crane M. Pomerantz
13		SKLAR WILLIAMS PLLC Crane M. Pomerantz, Esq.
14		Nevada Bar No. 14103
15		Brent M. Resh, Esq. Nevada Bar No. 14940
16		410 South Rampart Boulevard, Suite 350 Las Vegas, Nevada 89145
17		-
18		Attorneys for Defendants Dr. Mirza and Vista Health
19		
20		
21		IT IS SO ORDERED.
22		Can Harden
23		U.S. Magistrate Judge
24		Cam Ferenbach
25		DATED: May 12, 2021
26		DAIED:
27		
28		
I	1	