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11 *Attorneys for Plaintiffs Valley Health Systems, LLC*
 12 *DVH Hospital Alliance, LLC and*
 13 *Summerlin Hospital Medical Center, LLC*

14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 VALLEY HEALTH SYSTEM, LLC, a Delaware
 Limited Liability company, DVH HOSPITAL
 17 ALLIANCE, LLC, a Delaware Limited Liability
 company, and SUMMERLIN HOSPITAL
 18 MEDICAL CENTER, LLC, a Delaware Limited
 Liability company,

19 Plaintiffs,

20 vs.

21 TRAVEL INSURANCE FACILITIES, PLC, a
 Foreign Corporation, UNION
 22 REISEVERSICHERUNG
 23 AKTIENGESELLSCHAFT, a Foreign
 24 Corporation,

25 Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**PLAINTIFF’S LOCAL RULE IA 6-1.
 MOTION FOR ENLARGEMENT OF
 TIME TO EFFECTUATE SERVICE**

26
 27 COME NOW, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and
 28 Summerlin Hospital Medical Center, LLC, (collectively, “Plaintiffs”), by and through their

1 undersigned counsel, and, pursuant to Local Rule 6-1 hereby move this Honorable Court for an
2 enlargement of time for an additional sixty (60) days through and including September 25, 2022
3 within which to effectuate service of the Summons, Complaint and Standing Order upon Defendant,
4 TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, and state as follows:

5 1. Since the filing of the Complaint, the Plaintiff has attempted to obtain service of the
6 Summons, Complaint and Standing Order on Defendant, TRAVEL INSURANCE FACILITIES,
7 PLC, a Foreign Corporation (“TIF”), through the Hague Convention.

8 2. The undersigned has been advised that due to processing delays in the United
9 Kingdom, there have been significant delays in obtaining service and receiving proof of service on
10 the Defendant. We expect that service will be completed soon but until then, we are requesting an
11 additional sixty (60) days to obtain service of the Summons, Complaint and Standing Order upon the
12 Defendant.

13 3. While Fed.R.Civ.P. 4(m) requires service within 90 days after filing of a Complaint,
14 subdivision (m) does not apply to service in a foreign country under [Rule 4\(f\)](#) or [4\(h\)\(2\)](#), the
15 provisions under which the Plaintiff is attempting to obtain service on the Defendants in this action.

16 4. Nevertheless, in an abundance of caution and in the interests of judicial economy, the
17 Plaintiff requests an additional sixty (60) days to obtain service of the Summons, Complaint and
18 Standing Order upon the Defendant and respectfully requests this Honorable Court enter its Order
19 enlarging the time to effectuate service accordingly.

20 5. This Motion is made in good faith and not for the purposes of harassment or delay.

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1 WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH
2 Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, respectfully request an
3 additional sixty (60) days through and including September 25, 2022, in which to effectuate service
4 of Summons and Complaint upon the Defendant, TIF as aforesaid and for such other and further relief
5 as the Court deems appropriate.

6 DATED this 27th day of July, 2022.

7 **WILEY PETERSEN**

8 */s/ Jason M. Wiley*

9 _____
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*Attorneys for Plaintiffs Valley Health
Systems, LLC, DVH Hospital
Alliance, LLC and Summerlin
Hospital Medical Center LLC*

23 **IT IS THEREFORE ORDERED** that Plaintiffs' motion to extend time (ECF No. 31) is
24 **granted.**

25 **IT IS FURTHER ORDERED** that Plaintiffs shall have until **September 25, 2022** to
26 serve Defendant Travel Insurance Facilities, PLC.

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28 _____
DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: July 29, 2022

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Wiley Petersen, and that on the 27th day of July,
3 2022, I caused to be served a true and correct copy of the foregoing **PLAINTIFF’S LOCAL RULE**
4 **IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE SERVICE** in the
5 following manner:

6 (ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the
7 United States District Court for the District of Nevada, the above-referenced document was
8 electronically filed on the date hereof and served through the Notice of Electronic Filing automatically
9 generated by that Court’s facilities.

10 (UNITED STATES MAIL) By depositing a copy of the above-referenced document for
11 mailing in the Unites States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties
12 listed below at their last-known mailing addresses, on the date above written.

13 (ELECTRONIC E-MAIL)

14
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23 *Attorneys for Defendants Travel Insurance Facilities, PLC*
24 *and Union Reiseversicherung Aktiengesellschaft*

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/s/ Timothy M. Hartley, Esq.

HARTLEY LAW OFFICES, PLC