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Attorneys for Plaintiffs Valley Health Syst DVH Hospital Alliance, LLC and Summerlin Hospital Medical Center, L		,
		STRICT COURT
DISTR	dci or	NEVADA
VALLEY HEALTH SYSTEM, LLC, a D		CASE NO.: 2:22-CV-00365-ART-DJA
Limited Liability company, DVH HO ALLIANCE, LLC, a Delaware Limited		611821.011 2.22
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1 3/	SPITAL	
MEDICAL CENTER, LLC, a Delaware		PLAINTIFF'S LOCAL RULE IA 6-1.
		PLAINTIFF'S LOCAL RULE IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE SERVICE
MEDICAL CENTER, LLC, a Delaware		MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company,		MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs,	Limited	MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs, vs. TRAVEL INSURANCE FACILITIES, Foreign Corporation,	Limited	MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs, vs. TRAVEL INSURANCE FACILITIES, Foreign Corporation, REISEVERSICHERUNG	PLC, a UNION	MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs, vs. TRAVEL INSURANCE FACILITIES, Foreign Corporation,	Limited PLC, a	MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs, vs. TRAVEL INSURANCE FACILITIES, Foreign Corporation, REISEVERSICHERUNG AKTIENGESELLSCHAFT, a	PLC, a UNION	MOTION FOR ENLARGEMENT OF
MEDICAL CENTER, LLC, a Delaware Liability company, Plaintiffs, vs. TRAVEL INSURANCE FACILITIES, Foreign Corporation, REISEVERSICHERUNG AKTIENGESELLSCHAFT, a Corporation, Defendants.	PLC, a UNION Foreign	MOTION FOR ENLARGEMENT OF

Valley Health System, LLC et al v. Travel Insurance Facilities, PLC et al Case 2:22-cv-00365-ART-DJA Document 38 Filed 09/27/22 Page 1 of 10

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undersigned counsel, and, pursuant to Local Rule 6-1 hereby move this Honorable Court for an enlargement of time for an additional sixty (60) days through and including November 24, 2022 within which to effectuate service of the Summons, Complaint and Standing Order upon Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, and state as follows:

- 1. Since the filing of the Complaint, the Plaintiff has attempted to obtain Article 5 service of the Summons, Complaint and Standing Order on Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation ("TIF"), through the Hague Convention.
- 2. The undersigned has recently been advised that although a bailiff assigned by the Royal Courts of Justice attempted to obtain service on Jonathon Phillips of TIF at his workplace, the bailiff was unable to meet Mr. Phillips and left the papers unserved, despite the fact that service could have been accomplished on other authorized representatives of TIF present at the workplace at the time of the bailiff's attempt. A true and correct copy of correspondence attesting to the Plaintiffs' efforts to obtain service on TIF through Article 5 of the Hague Convention is attached to this Motion as *Exhibit A*.
- 3. The undersigned intends to make additional attempts to effectuate service on Defendant, TIF and, as demonstrated by Exhibit A, has advised the Foreign Process Section of the Royal Copurts of Justice that service can be had on other authorized representatives of TIF.
- 4. While Fed.R.Civ.P. 4(m) requires service within 90 days after filing of a Complaint, subdivision (m) does not apply to service in a foreign country under <u>Rule 4(f)</u> or <u>4(h)(2)</u>, the provisions under which the Plaintiff is attempting to obtain service on the Defendants in this action.
- 5. Nevertheless, in an abundance of caution and in the interests of judicial economy, the Plaintiff requests an additional sixty (60) days to obtain service of the Summons and Amended Complaint upon the Defendant, TIF and respectfully requests this Honorable Court enter its Order enlarging the time to effectuate service accordingly.
 - 6. This Motion is made in good faith and not for the purposes of harassment or delay.
- 7. The undersigned has contacted counsel for the Defendant has no objection to the filing of this Motion or the relief sought herein.

WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, respectfully request an additional sixty (60) days through and including November 24, 2022, in which to effectuate service of Summons and Complaint upon the Defendant, TIF as aforesaid and for such other and further relief as the Court deems appropriate.

DATED this 23rd day of September, 2022.

WILEY PETERSEN

/s/ Jason M. Wiley

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Nevada Bar No. 10715
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hartley@hartleylaw.net

Attorneys for Plaintiffs Valley Health Systems, LLc, DVH Hospital Alliance, LLC and Summerlin Hospital Medical Center, LLC

IT IS SO ORDERED.

DATED: 9/27/2022

DANIEL J. ALBREGUS

UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE** 2 I hereby certify that I am an employee of Hartley Law Offices, PLC, and that on the 23rd day 3 of September, 2022, I caused to be served a true and correct copy of the foregoing PLAINTIFF'S 4 LOCAL RULE IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE 5 **SERVICE** in the following manner: (ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the 6 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 mailing in the Unites States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties 11 12 listed below at their last-known mailing addresses, on the date above written. 13 (ELECTRONIC E-MAIL) 14 Pat Lundvall (NSBN 3761) 15 Daniel Aquino (NSBN 12682) McDONALD CARANO LLP 16 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 17 Telephone: (702) 873-4100 18 lundvall@mcdonaldcarano.com daquino@mcdonaldcarano.com 19 Attorneys for Defendants Travel Insurance Facilities, PLC and Union Reiseversicherung Aktiengesellschaft 20 21 22 /s/Timothy M. Hartley, Esq. 23 24 HARTLEY LAW OFFICES, PLC 25 26 27 28

Exhibit A

From: Hartshorne, Tatyana on behalf of Foreign Process (RCJ)

To: Yanique Reid

Subject: RE: QF-2022-004875;RE: Status of Service- Valley Health v. TIF*****Update Requested******

Date: Thursday, September 22, 2022 10:13:35 AM

Dear Yanique

Thank you for your email.

I would like to inform you that the documents were sent for personal service on Mr Jon Phillips at his workplace as it stated in the request form that you have provided.

Bailiff were unable to meet the person, therefore, documents returned unserved. A certificate of non-service will be issued in due course.

Kind regards

Tatyana Hartshorne

Administrative Officer

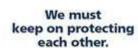
Foreign Process Section

HMCTS Royal Courts of Justice London WC2A 2LL

Phone: 0203 936 8957 Option 7

Web: www.gov.uk/hmcts

For information on how HMCTS uses personal data about you please see: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personalinformation-charter









From: Yanique Reid <reid@hartleylaw.net>

Sent: 13 September 2022 19:06

To: Foreign Process (RCJ) <foreignprocess.rcj@Justice.gov.uk>

Cc: Tim Hartley <hartley@hartleylaw.net>

Subject: RE: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Update

Requested*****

Good Day Tatyana-

Just following up on our prior conversation below. Please let us know the status of service of process on Defendant, TIF. I look forward to hearing from you. Thank you.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

12 Southeast Seventh Street, Suite 610

Fort Lauderdale, FL 33301 U.S.A

t: 954.357.9973 f: 954.357.2275

reid@hartleylaw.net

www.hartleylaw.net

From: Hartshorne, Tatyana < Tatyana. Hartshorne1@Justice.gov.uk > On Behalf Of Foreign Process

(RCJ)

Sent: Tuesday, August 30, 2022 3:53 AM To: Yanique Reid <reid@hartleylaw.net>

Subject: RE: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Updated*****

Dear Yanique

Thank you for your email regarding service documents on Jon Phillips at workplace.

We have not received confirmation from bailiff yet, so a chase up letter has been sent.

We will inform you as soon as possible bailiff comes back to us.

Kind regards

Tatyana Hartshorne

Administrative Officer

Foreign Process Section

HMCTS Royal Courts of Justice London WC2A 2LL

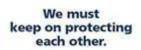
Phone: 0203 936 8957 Option 7

Web: www.gov.uk/hmcts

For information on how HMCTS uses personal data about you please see:

https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-

information-charter









From: Yanique Reid < reid@hartleylaw.net>

Sent: 23 August 2022 14:35

To: Foreign Process (RCJ) < foreignprocess.rcj@Justice.gov.uk >

Cc: Tim Hartley < hartley@hartleylaw.net>

Subject: RE: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Updated******

Good Morning

Just following up on our prior conversation below. Please let us know the status of service of process on Defendant, TIF. I look forward to you update. Thank you.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

12 Southeast Seventh Street, Suite 610

Fort Lauderdale, FL 33301 U.S.A

t: 954.357.9973 f: 954.357.2275

reid@hartleylaw.net

www.hartleylaw.net

From: Yanique Reid

Sent: Tuesday, July 26, 2022 10:01 AM

To: Foreign Process (RCJ) < foreignprocess.rcj@Justice.gov.uk >

tey law Offices, PLC

Cc: Tim Hartley < hartley@hartleylaw.net >

Subject: RE: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Updated******

Okay, thank you.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

12 Southeast Seventh Street, Suite 610

Fort Lauderdale, FL 33301 U.S.A

t: 954.357.9973 f: 954.357.2275

reid@hartleylaw.net

www.hartleylaw.net

From: Hartshorne, Tatyana < Tatyana. Hartshorne1@Justice.gov.uk > On Behalf Of Foreign Process

(RCJ)

Sent: Tuesday, July 26, 2022 9:55 AM **To:** Yanique Reid < reid@hartleylaw.net >

Subject: QF-2022-004875; RE: Status of Service- Valley Health v. TIF*****Updated******

Dear Yanique

Thank you for your email.

I would like to inform you that the documents were sent for service on 15 July 2022 under our reference number QF-2022-004875.

Therefore, bailiff have 4 weeks to serve and to return to us confirmation of service/non-service.

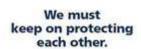
Please allow bailiff complete their job.

Kind Regards

Tatyana Hartshorne Administrative Officer Foreign Process Section HMCTS Royal Courts of Justice London WC2A 2LL Phone: 0203 936 8957 Option 7

Web: www.gov.uk/hmcts

For information on how HMCTS uses personal data about you please see: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personalinformation-charter









From: Yanique Reid < reid@hartleylaw.net>

Sent: 26 July 2022 14:21

To: Foreign Process (RCJ) < foreignprocess.rcj@Justice.gov.uk >

Cc: Tim Hartley < hartley@hartleylaw.net>

Subject: RE: Status of Service- Valley Health v. TIF*****Updated******

Good Morning

Just following up on our prior conversation below. Please let us know the status of service of

process on Defendant, TIF. I look forward to you update. Thank you.

they law Offices, PLC

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

12 Southeast Seventh Street, Suite 610 Fort Lauderdale, FL 33301 U.S.A

t: 954.357.9973 f: 954.357.2275 reid@hartleylaw.net www.hartleylaw.net

From: Yanique Reid

Sent: Friday, July 15, 2022 9:33 AM

To: Foreign Process (RCJ) < foreignprocess.rcj@Justice.gov.uk >

Cc: Tim Hartley < hartley@hartleylaw.net>

Subject: RE: Status of Service- Valley Health v. TIF*****Updated******

Hices, PLC

Good Morning-

Thank you.

Yanique S. Reid

Paralegal to Timothy M. Hartley, Esq.

12 Southeast Seventh Street, Suite 610

Fort Lauderdale, FL 33301 U.S.A

t: 954.357.9973 f: 954.357.2275

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