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8 *Attorneys for Savant Addiction Medicine LLC and*  
 9 *Savant HWP Holdings, LLC.*

10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 SCOTT FREEMAN, M.D., as TRUSTEE  
 FOR THE SCOTT MITCHELL FREEMAN  
 13 REVOCABLE LIVING TRUST, dated  
 March 10, 2012, for itself as assignee of  
 14 FERDINAND BELGA;

15 **Plaintiffs,**

16 vs.

17 STEPHEN HURST; SUNRAY ASSET  
 MANAGEMENT, INC.; NICO FORTE;  
 18 CERUVIA LIFESCIENCES f/k/a CH-TAC;  
 CAREY TURNBULL; RUSSELL  
 19 BURBANK, as liquidating trustee for  
 nominal defendants SAVANT ADDICTION  
 20 MEDICINE, LLC and SAVANT HWP  
 HOLDINGS, LLC; DOE INDIVIDUALS 1  
 21 through 20; and ROE CORPORATIONS 1  
 through 20,

22 **Defendants.**

23 *and*

24 SAVANT ADDICTION MEDICINE, LLC;  
 25 SAVANT HWP HOLDINGS, LLC; and  
 SAVANT HWP, INC.,

26 **Nominal Defendants.**

Case No.: 2:22-cv-01433-RFB-MDC

Consolidated with:

2:22-cv-01903-JCM-BNW

**STIPULATION AND PROPOSED ORDER TO  
 EXTEND THE DEADLINE FOR  
 DEFENDANTS SAVANT ADDICTION  
 MEDICINE LLC AND SAVANT HWP  
 HOLDINGS, LLC TO RESPOND TO THE  
 SECOND AMENDED COMPLAINT**

1 Plaintiff SCOTT FREEMAN, M.D., as TRUSTEE FOR THE SCOTT MITCHELL FREEMAN  
2 REVOCABLE LIVING TRUST, dated March 10, 2012, for itself as assignee of FERDINAND BELGA  
3 (**Plaintiff**) and Defendants SAVANT ADDICTION MEDICINE, LLC and SAVANT HWP HOLDINGS,  
4 LLC (collectively, **Defendants**), by their attorneys, hereby submit this Stipulation to extend the deadline  
5 for Defendants to file the response to the Second Amended Complaint.

6 On December 6, 2023, Plaintiff filed a Second Amended Complaint in this action consisting of  
7 1,271 paragraphs and 116 exhibits (ECF Nos. 141 through 145–50). Due to the length of the Second  
8 Amended Complaint, the parties agreed that all defendants would have until February 2, 2024, to file  
9 responses to the Second Amended Complaint, and the stipulation was adopted by the Court in the Second  
10 Amended Joint Discovery Plan and Scheduling order. ECF No. 136.

11 Throughout the month of January, Defendants’ lead counsel suffered from a severe case of the flu  
12 and pneumonia, which resulted in a multi-day hospitalization. These illnesses substantially impacted  
13 counsel’s ability to perform legal work.

14 As a courtesy to counsel as a result of the above-described illness, the parties agree that  
15 Defendants’ response to the Second Amended Complaint should be extended to February 9, 2024. The  
16 parties stipulate to this extension in good faith and not to harass or cause undue delay.

17 The parties’ specific stipulations are as follows:

18 1. The deadline for Defendants SAVANT ADDICTION MEDICINE, LLC and SAVANT  
19 HWP HOLDINGS, LLC to file a response to the Second Amended Complaint, currently set for February  
20 2, 2024, should be extended to February 9, 2024.

1 DATED this 2<sup>nd</sup> day of February 2024

2 **LEWIS ROCA ROTHGERBER**  
3 **CHRISTIE**

4 /s/ J. Christopher Jorgensen

5 Daniel F. Polsenberg,  
6 Nevada Bar No. 2376  
7 J. Christopher Jorgensen  
8 Nevada Bar No. 5382  
9 Abraham G. Smith  
10 Nevada Bar No. 13250  
11 3993 Howard Hughes Pkwy., Ste. 600  
12 Las Vegas, NV 89169

13 *Attorneys for Plaintiff*

DATED this 2<sup>nd</sup> day of February 2024

**TROUTMAN PEPPER HAMILTON SANDERS LLP**

/s/ Brody R. Wight

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Nevada Bar No. 13615  
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*Attorneys for Savant Addiction Medicine LLC and  
Savant HWP Holdings, LLC.*

14 **ORDER**

15 IT IS HEREBY ORDERED the deadline for Defendants SAVANT ADDICTION MEDICINE,  
16 LLC and SAVANT HWP HOLDINGS, LLC to file a response to the Second Amended Complaint,  
17 currently set for February 2, 2024, should be extended to February 9, 2024.

18 \_\_\_\_\_  
19 JUDGE, UNITED STATES DISTRICT COURT

20 Dated: 2/6/2024

21 Respectfully submitted by:

**TROUTMAN PEPPER HAMILTON SANDERS LLP**

22 /s/ Brody R. Wight

23 Brody R. Wight  
24 Nevada Bar No. 13615  
25 James H.S. Levine (*pro hoc viche*)  
26 8985 S. Eastern Ave., Ste. 200,  
27 Las Vegas, NV 89123 (*Nevada Office*)  
28 600 Peachtree St. NE # 3000, Atlanta, GA 30308

*Attorneys for Savant Addiction Medicine LLC  
and Savant HWP Holdings, LLC.*

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on this 2<sup>nd</sup> day of February 2024, I caused to be served a true and  
3 correct copy of the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND THE**  
4 **DEADLINE FOR DEFENDANTS SAVANT ADDICTION MEDICINE LLC AND SAVANT HWP**  
5 **HOLDINGS, LLC TO RESPOND TO THE SECOND AMENDED COMPLAINT**, in the following  
6 manner:

7  **(ELECTRONIC SERVICE)** Pursuant to FRCP 5(b), the above referenced document was  
8 electronically filed on the date hereof with the Clerk of the Court for the United States District Court by  
9 using the Court's CM/ECF system and served through the Court's Notice of electronic filing system  
10 automatically generated to those parties registered on the Court's Master E-Service List.

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

|  |  |
|--|--|
| 14 David S. Kupetz<br>Sulmeyer Kupetz<br>333 South Hope Street<br>Thirty-Fifth Floor<br>Los Angeles, CA 90071-1406 | Rory S. Miller<br>Locke Lord LLP<br>300 S. Grand Ave.<br>Suite 2600<br>Los Angeles, CA 90071 |
| 18 William C Mullen<br>Locke Lord LLP<br>300 S. Grand Avenue<br>Suite 2600<br>Los Angeles, CA 90071                |  |

21  **(PERSONAL SERVICE)** By causing to be personally delivered a copy of the  
22 above-referenced document to the person(s) listed below: N/A

23  **(EMAIL)** By emailing a true and correct copy of the above-referenced document to the  
24 person(s) listed below: N/A

25 I declare that I am employed in the office of a member of the bar of this Court at whose discretion  
26 the service was made.

27 /s/ Carla Llarena  
An employee of TROUTMAN PEPPER HAMILTON  
28 SANDERS, LLP