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 15 UNITED STATES DISTRICT COURT  
 16 DISTRICT OF NEVADA

17 MEDCHOICE RISK RETENTION GROUP,  
 INC.  
 18  
 Plaintiff,  
 19  
 v.  
 20 ROBERT G. RAND, M.D., and RAND FAMILY  
 CARE LLC  
 21  
 Defendant.  
 22

Case No. 3:16-cv-00418-MMD-VPC

**JOINT STIPULATION TO  
 CONTINUE DEADLINE TO FILE  
 PLAINTIFF'S REPLY IN SUPPORT  
 OF ITS MOTION FOR SUMMARY  
 JUDGMENT [DKT. 65]  
 [SECOND REQUEST<sup>1</sup>]**

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 26 <sup>1</sup> The reply deadline was continued once to accommodate a stipulated continuance for Defendants' Response.

JOINT STIPULATION TO CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT [DKT. 65]

1 **JOINT STIPULATION**

2 Plaintiff MedChoice Risk Retention Group, Inc. and Defendants Robert G. Rand, M.D.  
3 and Rand Family Care LLC, by and through their respective counsel, hereby stipulate as follows:

4 1. Plaintiff MedChoice filed a Motion for Summary Judgment on February 5, 2018.

5 2. On February 16, 2018, the parties stipulated to an extension of time for newly  
6 retained counsel Matthew Sharp to respond to MedChoice’s motion.

7 3. That stipulation extended the response deadline from February 26, 2018 to March  
8 19, 2018 and extended the reply deadline from March 12, 2018 to April 2, 2018.

9 4. The Court granted the stipulated continuation of deadlines, and Defendants  
10 served their response brief on March 19, 2018.

11 3. MedChoice is now requesting additional time to reply in support of its Motion  
12 for Summary Judgment to accommodate client schedules and to the intervening Easter holiday;

13 4. Therefore, the parties jointly request that the Court extend the deadline to file  
14 Plaintiffs’ Reply from April 2, 2018 to **April 16, 2018**.

15 5. The parties submit that this request is not made for the purposes of delay but for  
16 purposes of judicial economy.

1 Respectfully submitted this 28<sup>th</sup> day of March, 2018.

2 COZEN O'CONNOR

3 MATTHEW L. SHARP, LTD.

4 By: /s/ Shauna Martin Ehlert  
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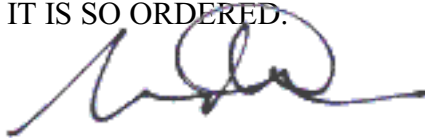
*Attorneys for Defendants*

*Attorneys for Plaintiff*

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14 The deadline for Plaintiffs' Reply is extended from April 2, 2018 to April 16, 2018.

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16 IT IS SO ORDERED.

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18 Dated: March 28, 2018

  
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U.S. District Judge

JOINT STIPULATION TO CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT OF ITS  
MOTION FOR SUMMARY JUDGMENT [DKT. 65]

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing document was served on March 28, 2018 via the Court's CM/ECF system, to all registered participants as identified on the Notice of Electronic Filing.

*/s/ Shauna Martin Ehlert*

Shauna Martin Ehlert

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