



Navajo Health Foundation - Sage Memorial Hospital Incorporated v. Razaghi Development Company

2022 | Cited 0 times | D. Arizona | December 30, 2022

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA NAVAJO HEALTH FOUNDATION – SAGE MEMORIAL HOSPITAL, INC. (doing business as “Sage Memorial Hospital”); an Arizona non-profit corporation,

Plaintiff, vs. RAZAGHI DEVELOPMENT COMPANY, LLC; a Nevada limited liability company (doing business as “Razaghi Healthcare”), AHMAD R. RAZAGHI; individually, TAUSIF HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COUNTERCLAIMS AND SECOND AMENDED THIRD-PARTY CLAIMS (SECOND REQUEST) Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Third - Party Defendants, Christi El-Meligi and Netrishia Dalgai additional time, to and until January 11, 2023, to respond to “Defendant RDC’s Counterclaims And Second Amended Third- Party Claims” filed by Razaghi Development Company, LLC (“RDC”) on November 29, 2022. ECF No. 217.

In support of this Stipulation, the parties rely upon the following: 1. Ms. El-Meligi and Ms. Dalgai are no longer employed by Sage Memorial Hospital. Accordingly, additional time has been required to contact them and discuss the allegations in the Second Amended Third-Party Claims filing. Because of the holiday schedule and competing commitments, additional time will be needed to properly review the allegations being asserted by RDC with Ms. El-Meligi and Ms. Dalgai and



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respond to those allegations.

Counsel for both parties respectfully request the Court approve this Stipulation and permit Third-Party Defendants, Ms. El-Meligi and Ms. Dalgai to respond to RDC's November 29, 2022 filing on or before January 11, 2023.

The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt /s/ Paul S. Padda _____ Pavneet S. Uppal, Esq. Kathleen Bliss, Esq. Kris Leonhardt, Esq. Paul S. Padda, Esq. Jeffrey D. Winchester, Esq David Stander, Esq. Counsel for Razaghi Development Company, LLC Douglass A. Mitchell, Esq.

Counsel for Plaintiff, Dated: December 30, 2022 Counterdefendant and Third-Party

Defendants Dated: December 30, 2022

IT IS SO ORDERED:

_____ UNITED STATES MAGISTRATE JUDGE

DATED:

