



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

2021 | Cited 0 times | D. Arizona | December 13, 2021

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, v. RAZAGHI DEVELOPMENT COMPANY, LLC; a Nevada limited liability company (doing business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY JOINT STIPULATION TO EXTEND TIME FOR DEFENDANTS TO FILE REPLY IN SUPPORT OF DEFENDANTS’ MOTION TO DISMISS SECOND AMENDED COMPLAINT (FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively, “Defendants”) shall have an extension of time, up to and including January 21, 2022, to Jeffrey Winchester, NV Bar No. 10279 FISHER & PHILLIPS LLP 300 S. Fourth Street, Suite 1500 Las Vegas, Nevada 89101 Telephone: (702) 252-3131 Fax: (702) 252-7411 JWINCHESTER@fisherphillips.com Pavneet Singh Uppal, AZ SBN 016805 (Admitted Pro Hac Vice) Kris Leonhardt, AZ SBN 026401 (Admitted Pro Hac Vice) Nermana Pehlic, AZ SBN 035240 (Admitted Pro Hac Vice) FISHER & PHILLIPS LLP 3200 N. Central Avenue, Suite 1550 Phoenix, Arizona 85012-2487 Telephone: (602) 281-3400 Fax: (602) 281-3401 puppal@fisherphillips.com kleonhardt@fisherphillips.com npehlic@fisherphillips.com Attorneys for Defendants submit Defendants’ reply in support of their Motion to Dismiss Second Amended Complaint (ECF No. 147) therein addressing the arguments raised in Plaintiff’s Opposition to Defendants’ Second Motion to Dismiss (ECF No. 164).

The parties have so stipulated to this extension request due to defense counsel’s concurrent case obligations well as the recent and upcoming holidays. Since the filing of Plaintiff’s Opposition to Defendants’ Second Motion to Dismiss (ECF No. 164) on November 9, 2021, defense counsel has participated in an oral argument before the Ninth Circuit Court of Appeals, extensive and successful settlement negotiations on a collective action matter, and in preparing an opening brief in a subsequent Ninth Circuit Court of Appeals matter. Defendants now seek the instant extension through January 21, 2022 due to defense counsels’ upcoming case obligations including a preplanned City Council presentation regarding the collective action matter, a pre-scheduled settlement



conference in an unrelated case, and the upcoming winter holidays. The additional time requested herein will permit counsel for Defendants to meet other case commitments while addressing the arguments raised in Plaintiff's Opposition to Defendants' Second Motion to Dismiss (ECF No. 164). /
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The parties agree that good cause exists to support this request for Defendants to have additional time, up to and including January 21, 2022, to submit their reply in support of their Motion to Dismiss Second Amended Complaint. This is the first request to extend this deadline.

RESPECTFULLY SUBMITTED this 8th day of December 2021.

JENNER & BLOCK LLP

/s/ Douglass A. Mitchell (with permission) Douglass A Mitchell 1099 New York Avenue, N.S., Suite 900 Washington, DC 20001 Attorneys for Plaintiff

FISHER & PHILLIPS LLP

/s/ Kris Leonhardt Pavneet Singh Uppal (Admitted Pro Hac Vice) Kris Leonhardt (Admitted Pro Hac Vice) Nermana Pehlic (Admitted Pro Hac Vice) 3200 N. Central Avenue, Suite 1550 Phoenix, Arizona 85012-2487 Attorneys for Defendants

13 CERTIFICATE OF SERVICE This is to certify that on December 8, 2021, the undersigned, an employee of Fisher & Phillips LLP, electronically filed the Joint Stipulation to Extend Time for Defendants to File Reply in Support of Defendants' Motion to Dismiss Second Amended Complaint with the U.S. District Court, and a copy was electronically transmitted from the Court to the e- mail address on file for: Kathleen Bliss, Esq. KATHLEEN BLISS LAW, PLLC 1070 West Horizon Ridge Parkway, Suite 202 Henderson, NV 89012 kb@kathleenblisslaw.com David Joel Stander Law Office of David J. Stander LLC 10112 Burton Glen Drive Potomac, MD 20850 dstanderlaw@gmail.com Paul S. Padda, Esq. PAUL PADDA LAW, PLLC 4030 S. Jones Boulevard, Unit 30370 Las Vegas, NV 89173 psp@paulpaddalaw.com Douglass A. Mitchell, Esq. JENNER & BLOCK 1099 New York Ave, NW Suite 900 Washington, DC 20001-4412 dmitchell@jenner.com Attorneys for Plaintiff

/s/ Kris Leonhardt An employee of Fisher & Phillips LLP

