

Case No. \_\_\_\_\_

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IN THE SUPREME COURT OF NEVADA

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UNITE HERE HEALTH, a multi-employer health and welfare ERISA Section 3(37); and NEVADA HEALTH SOLUTIONS, LLC, a Nevada limited liability company,

Petitioners,

vs.

EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN  
AND FOR THE COUNTY OF CLARK, THE HONORABLE TARA CLARK  
NEWBERRY, DISTRICT COURT JUDGE,

Respondent,

- and -

STATE OF NEVADA EX REL. COMMISSIONER OF INSURANCE,  
BARBARA D. RICHARDSON, IN HER OFFICIAL CAPACITY AS  
STATUTORY RECEIVER FOR DELINQUENT DOMESTIC INSURER,  
NEVADA HEALTH CO-OP; and GREENBERG TRAURIG, LLP,

Real Parties in Interest.

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District Court Case No. A-15-725244-C, Department XXI

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**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF  
VOLUME 15 OF 19**

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JOHN R. BAILEY, Nevada Bar No. 0137  
DENNIS L. KENNEDY, Nevada Bar No. 1462  
SARAH E. HARMON, Nevada Bar No. 8106  
JOSEPH A. LIEBMAN, Nevada Bar No. 10125

**BAILEY ♦ KENNEDY**

8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

Telephone: 702.562.8820

Facsimile: 702.562.8821

JBailey@BaileyKennedy.com

DKennedy@BaileyKennedy.com

SHarmon@BaileyKennedy.com

JLiebman@BaileyKennedy.com

*Attorneys for Petitioners* UNITE HERE  
HEALTH and NEVADA HEALTH  
SOLUTIONS, LLC

**February 25, 2021**

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**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF**  
**VOLUME 15 OF 19**

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**TAB 40**

**TAB 40**

## Exhibit 7

Case Information

A-17-760558-B | Nevada Commissioner of Insurance, Plaintiff(s) vs. Milliman Inc, Defendant(s)

Case Number	Court	Judicial Officer
A-17-760558-B	Department 16	Williams, Timothy C.
File Date	Case Type	Case Status
08/25/2017	Other Business Court Matters	Open

Party

Plaintiff  
Nevada Commissioner of Insurance  
  
Address  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas NV 89169

Active Attorneys ▼  
Lead Attorney  
Ferrario, Mark E.,  
ESQ  
Retained

Attorney  
Swanis, Eric W.  
Retained

Attorney  
Prunty, Donald L.  
Retained

Defendant  
Milliman Inc

Active Attorneys ▼  
Lead Attorney  
Dhalla, Aleem A.  
Retained

Attorney  
Byrne, Patrick G.  
Retained

	Attorney Fugazzi, Alexander L. Retained
Defendant Shreve, Jonathan L	Active Attorneys ▼ Lead Attorney Dhalla, Aleem A. Retained
	Attorney Byrne, Patrick G. Retained
	Attorney Fugazzi, Alexander L. Retained
Defendant Van Der Heijde, Mary	Active Attorneys ▼ Lead Attorney Dhalla, Aleem A. Retained
	Attorney Byrne, Patrick G. Retained
	Attorney Fugazzi, Alexander L. Retained
Defendant Millennium Consulting Services LLC	Active Attorneys ▼ Lead Attorney Bragonje, John E. Retained
	Attorney

	Hostetler, Jennifer K Retained
Defendant Larson & Company PC	Active Attorneys ▼ Lead Attorney Siderman, Lori E. Retained
	Attorney KERSHAW, SETH S, ESQ Retained
	Attorney Brown, Russell B Retained
Defendant Larson, Dennis T	Active Attorneys ▼ Attorney KERSHAW, SETH S, ESQ Retained
	Lead Attorney Siderman, Lori E. Retained
	Attorney Brown, Russell B Retained
Defendant Hayes, Martha	Active Attorneys ▼ Lead Attorney Siderman, Lori E. Retained
	Attorney Brown, Russell B Retained

Defendant  
InsureMonkey Inc

Active Attorneys ▼  
Lead Attorney  
Bonds, Kurt R.  
Retained

Attorney  
Pruitt, Mathew,  
ESQ  
Retained

Defendant  
Rivlin, Alex

Active Attorneys ▼  
Lead Attorney  
Bonds, Kurt R.  
Retained

Attorney  
Pruitt, Mathew,  
ESQ  
Retained

Defendant  
Nevada Health Solutions LLC

Active Attorneys ▼  
Lead Attorney  
Bailey, John R  
Retained

Attorney  
Liebman, Joseph  
A.  
Retained

Attorney  
Bonham, Suzanna  
C.  
Retained

Attorney  
Mata, Emma  
Retained

Defendant  
Egan, Pamela

Active Attorneys ▼  
Lead Attorney  
Garin, Joseph P  
Retained

Attorney  
Nakamura Ochoa,  
Angela T.  
Retained

Attorney  
Wong, Jonathan K.  
Retained

Defendant  
Dibsie, Basil C.

Active Attorneys ▼  
Lead Attorney  
Garin, Joseph P  
Retained

Attorney  
Nakamura Ochoa,  
Angela T.  
Retained

Attorney  
Wong, Jonathan K.  
Retained

Defendant  
Mattoon, Linda

Active Attorneys ▼  
Lead Attorney  
Garin, Joseph P  
Retained

Attorney  
Nakamura Ochoa,  
Angela T.  
Retained

Attorney  
Wong, Jonathan K.

Retained	
Defendant Zumtobel, Tom	Active Attorneys ▼ Lead Attorney Garin, Joseph P Retained
	Attorney Nakamura Ochoa, Angela T. Retained
	Attorney Wong, Jonathan K. Retained
Defendant Bond, Bobbette	Active Attorneys ▼ Lead Attorney Garin, Joseph P Retained
	Attorney Nakamura Ochoa, Angela T. Retained
	Attorney Wong, Jonathan K. Retained
Defendant Silver, Kathleen	Active Attorneys ▼ Lead Attorney Garin, Joseph P Retained
	Attorney Nakamura Ochoa, Angela T. Retained



	Attorney Wong, Jonathan K. Retained
<hr/>	
Defendant Unite Here Health	Active Attorneys ▼ Lead Attorney Bailey, John R Retained
<hr/>	
	Attorney Liebman, Joseph A. Retained
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	Attorney Mata, Emma Retained
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Events and Hearings

08/25/2017 Complaint ▼
Document Filed - DOC
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Basil C. Dibsie)
08/28/2017 Summons Electronically Issued - Service Pending ▼

Comment Summons (Pamela Egan)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Nevada Health Solutions, LLC)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Tom Zumtobel)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Linda Mattoon)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Martha Hayes)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Jonathan L. Shreve)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Milliman, Inc.)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Larson & Company P.C.)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Millennium Consulting Services, LLC)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Mary Van Der Heijde)
08/28/2017 Summons Electronically Issued - Service Pending ▼
Comment Summons (Dennis T. Larson)

**1687**  
**071**

08/28/2017 Summons Electronically Issued - Service Pending ▼

Comment

Summons (Bobbette Bond)

08/28/2017 Summons Electronically Issued - Service Pending ▼

Comment

Summons (Alex Rivlin)

08/28/2017 Summons Electronically Issued - Service Pending ▼

Comment

Summons (InsureMonkey, Inc.)

09/07/2017 Demand for Jury Trial ▼

Demand for Jury Trial - DMJT

Comment

Demand for Jury Trial

09/12/2017 Notice ▼

Notice - NOTC

Comment

Notice of Related Case

09/12/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (Alex Rivlin)

09/12/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (InsureMonkey, Inc.)

09/15/2017 Motion ▼

Motion - MOT

Comment

Motion to Coordinate Cases

09/18/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

**1688**  
**072**

## Affidavit of Service - Tom Zumtobel

09/18/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Milliman, Inc.

09/18/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

(9/20/2017 Withdrawn) Affidavit of Service - Pamela Egan

09/18/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Nevada Health Solutions, LLC

09/18/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Bobbette Bond

09/20/2017 Notice of Withdrawal ▼

Notice of Withdrawal - NOW

Comment

Notice of Withdrawal of Affidavit of Service on Pamela Egan

09/22/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (Basil C. Dibsie)

09/22/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (Pamela Egan)

09/22/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (Linda Mattoon)

**1689**  
**073**

09/22/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Martha Hayes

09/28/2017 Notice of Appearance ▼

Notice of Appearance - NOTA

Comment

Notice of Appearance

09/28/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Defendants' Initial Appearance Fee Disclosure

09/28/2017 Notice of Department Reassignment ▼

Notice of Department Reassignment - NODR

Comment

Notice of Department Reassignment

09/28/2017 Request to Transfer to Business Court ▼

Comment

Request to Transfer to Business Court

10/04/2017 Notice of Appearance ▼

Notice of Appearance - NOTA

Comment

Notice of Appearance

10/04/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Initial Appearance Fee Disclosure (NRS Chapter 19)

10/06/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Dennis T. Larson

10/06/2017 Affidavit of Service ▼

**1690**  
**074**

Affidavit of Service - AOS

Comment

Affidavit of Service - Jonathan L. Shreve

10/06/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Kathleen Silver

10/09/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Larson & Company, P.C.

10/10/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Initial Appearance Fee Disclosure

10/10/2017 Joinder ▼

Joinder - JOIN

Comment

Defendants Insuremonkey, Inc. and Alex Rivlin's Joinder to  
Request to Transfer to Business Court

10/10/2017 Answer (Business Court) ▼

Answer (Business Court) - ANSBU

Comment

Defendants' Answer to Complaint

10/17/2017 Minute Order ▼

Minute Order

Judicial Officer

Alf, Nancy

Hearing Time

3:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order: Disclosure

**1691**  
**075**

10/17/2017 Affidavit of Service ▼

Affidavit of Service - AOS

Comment

Affidavit of Service - Millennium Consulting Services, LLC

10/18/2017 Certificate of Service ▼

Certificate of Service - CSERV

Comment

Certificate of Service

10/19/2017 Motion to Coordinate ▼

Judicial Officer

Cory, Kenneth

Hearing Time

3:00 AM

Cancel Reason

Vacated

Comment

Health Care Co-op's Motion to Coordinate Cases

10/26/2017 Opposition to Motion ▼

Opposition to Motion - OPPM

Comment

Opposition to Motion to Coordinate Cases

10/26/2017 Motion to Dismiss ▼

Motion to Dismiss - MDSM

Comment

Millennium Consulting Services, LLC's Motion to Dismiss

10/26/2017 Notice of Appearance ▼

Notice of Appearance - NOTA

Comment

Notice of Appearance

10/26/2017 Disclosure Statement ▼

Disclosure Statement - DSST

Comment

Millennium Consulting Services, LLC's Disclosure Statement  
Pursuant to NRCP 7.1

**1692**  
**076**

10/30/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Initial Appearance Fee Disclosure (NRS Chapter 19)

10/30/2017 Joinder ▼

Joinder - JOIN

Comment

Joinder of Opposition to Motion to Coordinate Cases

10/30/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Initial Appearance Fee Disclosure (NRS Chapter 19)

10/30/2017 Joinder ▼

Joinder - JOIN

Comment

Defendants Insuremonkey, Inc. And Alex Rivlin's Joinder To  
Opposition To Motion To Coordinate Cases

10/31/2017 Acceptance of Service ▼

Acceptance of Service - ACSR

Comment

Acceptance of Service (Mary Van Der Heijde)

10/31/2017 Joinder to Opposition to Motion ▼

Joinder to Opposition to Motion - JOPP

Comment

Joiner to Milliman's Opposition to Motion to Coordinate

11/01/2017 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure - IAFD

Comment

Initial Appearance Fee Disclosure (NRS Chapter 19)

11/01/2017 Answer to Complaint ▼

Answer - ANS

Comment

Defendants, Martha Hayes, Dennis T. Larson, Larson &  
Company, P.C.'s Answer to Plaintiff's Complaint

**1693**  
**077**



11/01/2017 Joinder to Opposition to Motion ▼

Joinder to Opposition to Motion - JOPP

Comment

Defendants Martha Hayes, Dennis T. Larson, and Larson & Company P.C.'s Joinder to Opposition to Barbara D. Richardson's Receiver for Nevada Health Co-op, Motion to Coordinate Cases

11/03/2017 Reply in Support ▼

Reply - RPLY

Comment

Reply in Support of Motion to Coordinate Cases

11/06/2017 Motion to Compel ▼

Motion to Compel - MCOM

Comment

Motion to Compel Arbitration

11/07/2017 Answer to Complaint ▼

Answer - ANS

Comment

Nevada Health Solutions, LLC's Answer to Original Complaint

11/09/2017 Notice of Department Reassignment ▼

Notice of Department Reassignment - NODR

Comment

Notice of Department Reassignment

11/09/2017 Notice of Department Reassignment ▼

Notice of Department Reassignment - NODR

Comment

Amended Notice of Department Reassignment

11/09/2017 Peremptory Challenge ▼

Comment

Peremptory Challenge of Judge

11/09/2017 Initial Appearance Fee Disclosure ▼

Comment

Initial Appearance Fee Re: Peremptory Challenge of Judge

**1694**  
**078**

11/20/2017 Business Court Order ▼

Business Court Order - BCO (CIV)

Comment

**Business Court Order**

11/21/2017 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

**First Stipulation and Order to Extend Briefing Deadlines and Hearing on Millennium Consulting Services, LLC's Motion to Dismiss**

11/30/2017 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

**Stipulation and Order to Continue Defendants Milliman, Inc., Jonathan L. Shreve, and Mary Van Der Heijde's Motion to Compel Arbitration**

11/30/2017 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

**Notice of Entry of Stipulation and Order to Continue Defendants Milliman, Inc., Jonathan L. Shreve, and Mary Van Der Heijde's Motion to Compel Arbitration**

11/30/2017 Amended Affidavit of Service ▼

Amended Affidavit of Service - AAOS (CIV)

Comment

**Amended Affidavit of Service - Millennium Consulting Services, LLC**

12/11/2017 Order Denying Motion ▼

Order Denying Motion - ODM (CIV)

Comment

**Order Denying Plaintiff's Motion to Coordinate Cases**

12/11/2017 Opposition ▼

Opposition - OPPS (CIV)

Comment

**Plaintiff's Opposition to Milliman's Motion to Compel Arbitration**

12/12/2017 Notice of Entry of Order ▼

**1695  
079**

## Notice of Entry of Order - NEOJ (CIV)

## Comment

Notice of Entry of Order Denying Plaintiff's Motion to Coordinate Cases

## 12/15/2017 Stipulation and Order ▼

## Stipulation and Order - SAO (CIV)

## Comment

Stipulation and Order (Second) to Extend Briefing Deadlines and Hearing on Millennium Consulting Services, LLC's Motion to Dismiss

## 12/15/2017 Notice of Entry of Stipulation and Order ▼

## Notice of Entry of Stipulation and Order - NTSO (CIV)

## Comment

Notice of Entry of Stipulation and Order (Second) to Extend Briefing Deadlines and Hearing on Millennium Consulting Services, LLC's Motion to Dismiss

## 12/18/2017 Opposition ▼

## Opposition - OPPS (CIV)

## Comment

Plaintiff's Opposition to Defendant Millennium Consulting Services, LLC's Motion to Dismiss

## 12/19/2017 Motion to Associate Counsel ▼

## Association of Counsel - ASSC (CIV)

## 12/27/2017 Motion to Associate Counsel ▼

## Motion to Associate Counsel - MASS (CIV)

## Comment

Motion to Associate Justin N. Kattan As Counsel on an Order Shortening Time

## 01/02/2018 Motion to Associate Counsel ▼

## Minutes - Motion to Associate Counsel

## Judicial Officer

Delaney, Kathleen E.

## Hearing Time

9:00 AM

## Result

Motion Granted

**1696**  
**080**

## Comment

Defendants' Motion to Associate Justin N. Kattan as Counsel On an Order Shortening Time

## Parties Present ▲

Defendant

Attorney: Fugazzi, Alexander L.

Defendant

Attorney: Fugazzi, Alexander L.

Defendant

Attorney: Fugazzi, Alexander L.

## 01/02/2018 Errata ▼

Errata - ERR (CIV)

## Comment

Errata to Motion to Associate Justin N. Kattan As Counsel On an Order Shortening Time

## 01/03/2018 Reply in Support ▼

Reply in Support - RIS (CIV)

## Comment

Milliman's Reply in Support of Motion to Compel Arbitration

## 01/05/2018 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

## Comment

Order Granting Motion to Associate Justin N. Kattan, Esq. as Counsel

## 01/05/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

## Comment

Notice of Entry of Order Granting Motion to Associate Justin N. Kattan, Esq. As Counsel

## 01/09/2018 Motion to Compel ▼

Minutes - Motion to Compel

Judicial Officer

Delaney, Kathleen E.

Hearing Time

9:00 AM

Result

Motion Granted

**1697**  
**081**

## Comment

Motion to Compel Arbitration

## Parties Present ▲

## Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

## Defendant

Attorney: Byrne, Patrick G.

## Defendant

Attorney: Byrne, Patrick G.

## Defendant

Attorney: Byrne, Patrick G.

01/09/2018 Reply in Support ▼

Reply - RPLY (CIV)

## Comment

Millennium Consulting Services, LLC's Reply in Support of Its Motion to Dismiss

01/16/2018 Motion to Dismiss ▼

Minutes - Motion to Dismiss

## Judicial Officer

Gonzalez, Elizabeth

## Hearing Time

9:00 AM

## Result

Motion Denied

## Comment

Millennium Consulting Services, LLC's Motion to Dismiss

## Parties Present ▲

## Plaintiff

Attorney: Ferrario, Mark E., ESQ

## Defendant

Attorney: Bragonje, John E.

## Defendant

Attorney: KERSHAW, SETH S, ESQ

## Defendant

Attorney: KERSHAW, SETH S, ESQ

01/16/2018 Motion to Dismiss ▼

**1698**  
**082**

## Motion to Dismiss - MDSM (CIV)

## Comment

(8/15/18 Withdrawn) Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon s Motion to Dismiss, Alternatively for More Definite Statement

## 01/17/2018 Initial Appearance Fee Disclosure ▼

## Initial Appearance Fee Disclosure - IAFD (CIV)

## Comment

Initial Appearance Fee Disclosure

## 01/23/2018 Motion to Associate Counsel ▼

## Judicial Officer

Delaney, Kathleen E.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

Defendant, Nevada Health Solutions, LLC's, Motion to Associate Counsel

## 01/23/2018 All Pending Motions ▼

## Minutes - All Pending Motions

## Judicial Officer

Delaney, Kathleen E.

## Hearing Time

9:00 AM

## Result

Matter Heard

## Parties Present ▲

## Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

## Defendant

Attorney: Byrne, Patrick G.

## Defendant

Attorney: Byrne, Patrick G.

## Defendant

Attorney: Byrne, Patrick G.

## Defendant

**1699**  
**083**

Attorney: Bragonje, John E.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

#### 01/23/2018 Mandatory Rule 16 Conference ▼

Judicial Officer

Delaney, Kathleen E.

Hearing Time

10:30 AM

Result

Matter Heard

#### 01/23/2018 Order Admitting to Practice ▼

Order - ORDR (CIV)

Comment

Order Admitting to Practice

#### 01/23/2018 Joinder ▼

Joinder - JOIN (CIV)

Comment

(8/15/18 Withdrawn) Defendants Insuremonkey, Inc. And Alex Rivlin's Limited Joinder To Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie And Linda Mattoon's Motion To Dismiss, Alternativley For More Definite Statement

#### 01/24/2018 Order Setting Civil Jury Trial and Calendar Call ▼

Order Setting Civil Jury Trial and Calendar Call - OSCJC (CIV)

Comment

Business Court Scheduling Order Setting Civil Jury Trial and Pre-Trial Conference/Calendar Call

**1700**  
**084**

<div>01/26/2018 Notice of Entry of Order ▼</div> <div>Notice of Entry of Order - NEOJ (CIV)</div> <div>Comment</div> <div>Notice of Entry of Order Admitting to Practice</div>	
<div>02/06/2018 Stipulation and Order ▼</div> <div>Stipulation and Order - SAO (CIV)</div> <div>Comment</div> <div>Stipulation and Order to Continue the Motion to Dismiss, Alternatively for More Definite Statement</div>	
<div>02/06/2018 Notice of Entry ▼</div> <div>Notice of Entry - NEO (CIV)</div> <div>Comment</div> <div>Notice of Entry of Stipulation and Order to Continue the Motion to Dismiss, Alternatively for More Definite Statement</div>	
<div>02/13/2018 Status Check ▼</div> <div>Minutes - Status Check</div> <div>Minutes - Status Check</div> <div>Status Check</div> <div>Judicial Officer</div> <div>Delaney, Kathleen E.</div> <div>Hearing Time</div> <div>9:00 AM</div> <div>Result</div> <div>Continued</div> <div>Comment</div> <div>Status Check: ESI Protocols</div> <div>Parties Present ▲</div> <div>Plaintiff</div> <div>Attorney: Prunty, Donald L.</div> <div>Defendant</div> <div>Attorney: Nakamura Ochoa, Angela T.</div> <div>Defendant</div> <div>Attorney: Nakamura Ochoa, Angela T.</div> <div>Defendant</div> <div>Attorney: Nakamura Ochoa, Angela T.</div> <div>Defendant</div> <div>Attorney: Nakamura Ochoa, Angela T.</div>	



## Defendant

Attorney: Nakamura Ochoa, Angela T.

## Defendant

Attorney: Nakamura Ochoa, Angela T.

03/09/2018 Substitution of Attorney ▼

Substitution of Attorney - SUBT (CIV)

Comment

Substitutiuon Of Attorney

03/09/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Continue the Motion to Dismiss,  
Alternatively for More Definite Statement

03/12/2018 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

Comment

Order Granting Milliman's Motion to Compel Arbitration

03/12/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Granting Milliman's Motion to Compel  
Arbitration

03/23/2018 Motion ▼

Motion - MOT (CIV)

Comment

Plaintiff's Motion for Approval of Protective Order on Order  
Shortening Time

03/23/2018 Motion ▼

Motion - MOT (CIV)

Comment

Plaintiff's Motion for Approval of ESI Protocol on Order  
Shortening Time

03/27/2018 Receipt of Copy ▼

Receipt of Copy - ROC (CIV)

**1702**  
**086**

Comment  
Receipt of Copy

03/28/2018 Order ▼

Order - ORDR (CIV)

Comment  
Order Denying Millennium Consulting Services, LLC's Motion to Dismiss

03/29/2018 Response ▼

Response - RSPN (CIV)

Comment  
Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon s Response to The Plaintiff s Motion For Approval Of ESI Protocol On Order Shortening Time

03/29/2018 Response ▼

Response - RSPN (CIV)

Comment  
Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon s Response To The Plaintiff s Motion For Approval Of Protective Order On Order Shortening Time

03/29/2018 Motion to Reconsider ▼

Motion to Reconsider - MRCN (CIV)

Comment  
Plaintiff's Motion for Reconsideration

04/03/2018 Motion for Protective Order ▼

Judicial Officer  
Delaney, Kathleen E.

Hearing Time  
9:00 AM

Result  
Motion Granted

Comment  
Plaintiff's Motion for Approval of Protective Order on Order Shortening Time

04/03/2018 Petition for Approval ▼

Judicial Officer  
Delaney, Kathleen E.

**1703**  
**087**

Hearing Time  
9:00 AM

Result  
Motion Granted

Comment  
Plaintiff's Motion for Approval of ESI Protocol on Order Shortening Time

04/03/2018 All Pending Motions ▼

Minutes - All Pending Motions

Judicial Officer  
Delaney, Kathleen E.

Hearing Time  
9:00 AM

Result  
Matter Heard

Parties Present ▲  
Plaintiff

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

04/11/2018 Answer ▼

Answer - ANS (CIV)

**1704**  
**088**

<div>Comment</div> <div>Millennium Consulting Services, LLC's Answer</div>
<div>04/16/2018 Opposition to Motion ▼</div> <div>Opposition to Motion - OPPM (CIV)</div> <div>Comment</div> <div>Milliman's Opposition to Plaintiff's Motion for Reconsideration</div>
<div>04/19/2018 Stipulation and Order ▼</div> <div>Stipulation and Order - SAO (CIV)</div> <div>Comment</div> <div>Stipulation and Order to Continue the Motion to Dismiss, Alternatively for More Definite Statement and the Joinder Thereto</div>
<div>04/24/2018 Reply in Support ▼</div> <div>Reply in Support - RIS (CIV)</div> <div>Comment</div> <div>Plaintiff's Reply in Support of Motion for Reconsideration</div>
<div>05/01/2018 Motion For Reconsideration ▼</div> <div>Minutes - Motion For Reconsideration</div> <div>Minutes - Motion For Reconsideration</div> <div>Judicial Officer</div> <div>Delaney, Kathleen E.</div> <div>Hearing Time</div> <div>9:00 AM</div> <div>Result</div> <div>Matter Continued</div> <div>Comment</div> <div>Plaintiff's Motion for Reconsideration</div> <div>Parties Present ▲</div> <div>Plaintiff</div> <div>Attorney: Ferrario, Mark E., ESQ</div> <div>Attorney: Prunty, Donald L.</div> <div>Defendant</div> <div>Attorney: Byrne, Patrick G.</div> <div>Defendant</div> <div>Attorney: Byrne, Patrick G.</div> <div>Defendant</div> <div>Attorney: Byrne, Patrick G.</div>

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

05/03/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Continue the Motion to Dismiss  
Alternatively for More Definite Statement and the Joinder  
Thereeto

05/16/2018 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

Comment

Order Granting Motion for Approval of Protective Order and  
Motion for Approval of ESI Protocol

05/16/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Granting Motion for Approval of  
Protective Order and Motion for Approval of ESI Protocol

05/16/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Continue the Hearing Date and Set  
Briefing Schedule On Plaintiff's Motion for Reconsideration

05/16/2018 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Stipulation and Order to Continue the Hearing  
Date and Set Briefing Schedule On Plaintiff's Motion for  
Reconsideration

05/22/2018 Minute Order ▼

Minutes - Minute Order

Judicial Officer

Delaney, Kathleen E.

Hearing Time

**1706**  
**090**

3:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order Re-Setting Hearing

05/29/2018 Minute Order ▼

Minute Order

Judicial Officer

Alf, Nancy

Hearing Time

3:00 AM

Result

Minute Order - No Hearing Held

06/01/2018 Supplement to Opposition ▼

Supplement to Opposition - STO (CIV)

Comment

Milliman's Supplemental Brief In Opposition to Plaintiff's Motion  
for Reconsideration

06/05/2018 Motion for Summary Judgment ▼

Motion for Summary Judgment - MSJD (CIV)

Comment

Motion For Summary Judgment And Declaratory Relief

06/08/2018 Settlement Conference ▼

Settlement Conference

Judicial Officer

Alf, Nancy

Hearing Time

10:00 AM

Result

Not Settled

06/12/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Proposed Order to Continue the Motion to  
Dismiss, Alternative for More Definite State, and the Joinder  
Thereto

**1707**  
**091**

06/22/2018 Opposition ▼

Opposition - OPPS (CIV)

Comment

Plaintiff's Opposition to Insuremonkey, Inc and Alex Rivlin's  
Motion for Summary Judgment and Declaratory Relief

06/29/2018 Reply in Support ▼

Reply in Support - RIS (CIV)

Comment

Plaintiff's Sur-Reply in Support of Motion for Reconsideration

07/02/2018 Case Reassigned to Department 16 ▼

Comment

Reassigned From Judge Delaney - Dept 25

07/03/2018 Notice of Rescheduling of Hearing ▼

Notice of Rescheduling of Hearing - NORH (CIV)

Comment

Notice of Rescheduling Hearing

07/10/2018 Reply to Opposition ▼

Reply to Opposition - ROPP (CIV)

Comment

Reply to Plaintiff's Opposition to Insuremonkey, Inc. and Alex  
Rivin's Motion for Summary Judgment and Declaratory Relief

07/12/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Continue the Motion to Dismiss,  
Alternatively for more Definite Statement and the Joinder  
Thereto

07/12/2018 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Continue Hearing on Defendants  
Insuremonkey, Inc and Alex Rivlin's Motion for Summary  
Judgment and Declaratory Relief

07/17/2018 Motion to Amend Complaint ▼

Motion to Amend Complaint - MAMC (CIV)

**1708**  
**092**

Comment  
Plaintiff's Motion to Amend Complaint

07/18/2018 Order ▼

Order - ORDR (CIV)

Comment  
Administrative Order

07/18/2018 Notice of Department Reassignment ▼

Notice of Department Reassignment - NODR (CIV)

Comment  
Notice of Department Reassignment

07/18/2018 Notice of Department Reassignment ▼

Notice of Department Reassignment - NODR (CIV)

Comment  
Notice of Department Reassignment

07/19/2018 Notice of Change of Hearing ▼

Notice of Change of Hearing - NOCH (CIV)

Comment  
Notice of Change of Hearing

07/23/2018 Errata ▼

Errata - ERR (CIV)

Comment  
Errata To Defendants' Reply To Plaintiff's Opposition To  
InsureMonkey, Inc. And Alex Rivlin's Motion For Summary  
Judgment And Declaratory Relief

07/23/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
Notice Of Entry Of Order

07/24/2018 Motion For Reconsideration ▼

Judicial Officer  
Delaney, Kathleen E.

Hearing Time  
11:00 AM

Cancel Reason

**1709**  
**093**



Vacated - On in Error

Comment

Plaintiff's Motion for Reconsideration

07/25/2018 Motion for Summary Judgment ▼

Minutes - Motion for Summary Judgment

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Denied Without Prejudice

Comment

Defendants' Motion for Summary Judgment and Declaratory Relief

Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

08/08/2018 Order Denying Motion ▼

Order Denying Motion - ODM (CIV)

Comment

Order Denying Plaintiff's Motion for Reconsideration

08/08/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Denying Plaintiff's Motin for Reconsideration

08/08/2018 Notice of Change of Firm Name ▼

Notice of Change of Firm Name - NCFN (CIV)

Comment

Notice Of Change Of Firm Name

08/15/2018 Stipulation and Order ▼

**1710**  
**094**

## Stipulation and Order - SAO (CIV)

## Comment

Stipulation and Order to Withdraw Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Motion to Dismiss, Alternatively For More Definite Statement Without Prejudice

## 08/16/2018 Notice of Entry ▼

## Notice of Entry - NEO (CIV)

## Comment

Notice of Entry of Order

## 08/21/2018 Motion to Amend Complaint ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

Plaintiff's Motion to Amend Complaint

## 08/21/2018 Status Check ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Matter Heard

## Comment

Status Check: 16.1 Case Conference

## 08/21/2018 All Pending Motions ▼

## Minutes - All Pending Motions

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Matter Heard

## Parties Present ▲

Plaintiff

**1711**  
**095**

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

08/27/2018 Amended Order Setting Jury Trial ▼

Amended Order Setting Jury Trial - ARJT (CIV)

Comment

Amended Order Setting Jury Trial

09/05/2018 Motion to Dismiss ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Cancel Reason

Vacated - per Attorney or Pro Per

Comment

Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Motion to Dismiss, Alternatively for More Definite Statement

09/05/2018 Joinder ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Cancel Reason

Vacated - per Attorney or Pro Per

Comment

Defendants Insuremonkey Inc and Alex Rivlin's Limited Joinder to Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Motion to Dismiss, Alternatively for More Definite Statement

09/18/2018 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

Comment

Order Granting Motion to Amend Complaint

09/21/2018 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Granting Motion to Amend Complaint

09/24/2018 Summons Electronically Issued - Service Pending ▼

Comment

Summons - Unite Here Health

09/24/2018 Amended Complaint ▼

Amended Complaint - ACOM (CIV)

Comment

Amended Complaint

09/24/2018 Notice of Change of Address ▼

Notice of Change of Address - NCOA (CIV)

Comment

Notice of Change of Firm Address

10/04/2018 Ex Parte Motion ▼

Ex Parte Motion - EXMT (CIV)

Comment

Ex Parte Motion for Removal from Service List

10/05/2018 Motion to Dismiss ▼

Motion to Dismiss - MDSM (CIV)

Comment

Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie And Linda Mattoon s Motion To Dismiss, Alternatively For More Definite Statement

10/15/2018 Joinder To Motion ▼

**1713**  
**097**

## Joinder To Motion - JMOT (CIV)

## Comment

Defendants InsureMonkey, Inc. And Alex Rivlin's Joinder to Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie And Linda Mattoon's Motion To Dismiss, Alternatively For More Definite Statement

## 10/16/2018 Answer to Amended Complaint ▼

## Answer - ANS (CIV)

## Comment

Millennium Consulting Services, LLC's Answer to Amended Complaint

## 10/22/2018 Answer to Amended Complaint ▼

## Answer - ANS (CIV)

## Comment

Unite Here Health's Answer to Amended Complaint

## 10/22/2018 Initial Appearance Fee Disclosure ▼

## Initial Appearance Fee Disclosure - IAFD (CIV)

## Comment

Initial Appearance Fee Disclosure

## 10/22/2018 Opposition to Motion to Dismiss ▼

## Opposition - OPPS (CIV)

## Comment

Opposition to Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie, and Linda Mattoon s Motion to Dismiss, Alternatively for More Definite Statement

## 10/23/2018 Status Check ▼

## Minutes - Status Check

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Matter Continued

## Comment

Status Check re discovery issues/depositions

## Parties Present ▲

Plaintiff

Attorney: Prunty, Donald L.

**1714**  
**098**

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

10/25/2018 Opposition ▼

Opposition - OPPS (CIV)

Comment

Opposition to Defendants Insuremonkey, Inc. and Alex Rivlin's Joinder to Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon s Motion to Dismiss Alternatively for More Definite Statement

10/30/2018 Reply in Support ▼

Reply in Support - RIS (CIV)

Comment

Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie And Linda Mattoon s Reply In Support Of Motion To Dismiss First Amended Complaint

10/31/2018 Notice of Hearing ▼

Notice of Hearing - NOH (CIV)

Comment

Notice of Hearing For a Status Check Re: Deposition

11/02/2018 Status Check ▼

**1715**  
**099**

Minutes - Status Check

Minutes - Status Check

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

Result

Matter Heard

Comment

Status Check re Hearing re Depositions

Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

11/06/2018 Motion to Dismiss ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Motion Denied

Comment

Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Motion to Dismiss Alternatively for More Definite Statement

11/06/2018 Joinder ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Denied

Comment

Defendants Insuremonkey Inc and Alex Rivlin's Joinder to Kathleen Silver Bobbette Bond, Tome Zumtobel, Pamegan, Basil Dibsie and Linda Mattoon's Motion to Dismiss Alternatively for More Definite Statement

11/06/2018 All Pending Motions ▼

Minutes - All Pending Motions

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Matter Heard

Parties Present ▲

Plaintiff

Attorney: Swanis, Eric W.

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

11/06/2018 Answer ▼

Answer - ANS (CIV)

**1717**  
101



Comment

Defendants Martha Hayes, Dennis T. Larson, and Larson & Company, PC's Answer to Plaintiff's Amended Complaint

12/26/2018 Notice of Rescheduling of Hearing ▼

Notice of Rescheduling of Hearing - NORH (CIV)

Comment

Notice of Rescheduling Date for Calendar Call/Pre-Trial Conference

01/31/2019 Association of Counsel ▼

Association of Counsel - ASSC (CIV)

Comment

Motion to Associate Counsel

02/14/2019 Motion for Good Faith Settlement ▼

Comment

Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time

02/14/2019 Motion for Good Faith Settlement ▼

Comment

Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time

02/14/2019 Redacted Version ▼

Redacted Version

Comment

Redacted version of Motion for Good Faith Settlement per Order 5/20/19

02/14/2019 Filed Under Seal ▼

Comment

Exhibit A

02/14/2019 Redacted Version ▼

Redacted Version

Comment

Redacted version of Motion for Good Faith Settlement per Order 5/20/19

02/14/2019 Filed Under Seal ▼

**1718**  
**102**

<div>Comment</div> <div>Exhibit A</div>	
<div>02/15/2019 Motion to Seal/Redact Records ▼</div> <div>Motion to Seal/Redact Records - MSRC (CIV)</div> <div>Comment</div> <div>Plaintiff's Motion to File Confession of Judgment Under Seal</div>	
<div>02/19/2019 Answer ▼</div> <div>Answer - ANS (CIV)</div> <div>Comment</div> <div>Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Answer to the First Amended Complaint</div>	
<div>03/12/2019 Motion to Associate Counsel ▼</div> <div>Minutes - Motion to Associate Counsel</div> <div>Judicial Officer</div> <div>Williams, Timothy C.</div> <div>Hearing Time</div> <div>9:00 AM</div> <div>Result</div> <div>Motion Granted</div> <div>Comment</div> <div>Motion to Associate Counsel Emma Mata, Esq.</div> <div>Parties Present ▲</div> <div>Defendant</div> <div>Attorney: Pruitt, Mathew, ESQ</div> <div>Defendant</div> <div>Attorney: Pruitt, Mathew, ESQ</div> <div>Defendant</div> <div>Attorney: Wong, Jonathan K.</div> <div>Defendant</div> <div>Attorney: Wong, Jonathan K.</div> <div>Defendant</div> <div>Attorney: Wong, Jonathan K.</div> <div>Defendant</div> <div>Attorney: Wong, Jonathan K.</div> <div>Defendant</div> <div>Attorney: Wong, Jonathan K.</div>	

## Defendant

Attorney: Wong, Jonathan K.

03/12/2019 Order Admitting to Practice ▼

Order Admitting to Practice - ORAP (CIV)

Comment

Order Admitting to Practice

03/12/2019 Notice ▼

Notice - NOTC (CIV)

Comment

Notice of Entry of Order Admitting to Practice

03/19/2019 Motion for Determination of Good Faith Settlement ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Motion Granted

Comment

Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time

03/19/2019 Motion for Determination of Good Faith Settlement ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Motion Granted

Comment

Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time

03/19/2019 Motion to Seal/Redact Records ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

**1720**  
**104**

Result  
Motion Granted

Comment  
Plaintiff's Motion to File Confession of Judgment Under Seal

03/19/2019 All Pending Motions ▼

Minutes - All Pending Motions

Judicial Officer  
Williams, Timothy C.

Hearing Time  
9:00 AM

Result  
Matter Heard

Parties Present ▲  
Plaintiff

Attorney: Prunty, Donald L.

Defendant

Attorney: Bragonje, John E.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Garin, Joseph P

Defendant

Attorney: Garin, Joseph P

Defendant

Attorney: Garin, Joseph P

Defendant

Attorney: Garin, Joseph P

Defendant

Attorney: Garin, Joseph P

Defendant

Attorney: Garin, Joseph P

03/20/2019 Motion to Seal/Redact Records ▼

Motion to Seal/Redact Records - MSRC (CIV)

Comment

Motion to Seal Settlement Agreement attached as Exhibit "A" to the Settling Parties' "Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time"

03/27/2019 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

03/27/2019 Filed Under Seal ▼

Comment

Sealed Exhibit "A" to: The Settling Parties' "Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time Filed Under Seal Per 03/20/2019 Motion to Seal Settlement Agreement Attached as Exhibit "A" to the Settling Parties' "Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time"

04/08/2019 Order Granting ▼

Order Granting - ORDG (CIV)

Comment

Order Granting Plaintiff's Motion to File Confession of Judgement Under Seal

04/08/2019 Order ▼

Order - ORDR (CIV)

Comment

Order Approving Joint Motion for Determination of Good Faith Settlement by Plaintiff and Defendant Millennium Consulting Services, LLC on Order Shortening Time

04/10/2019 Motion to Extend Discovery ▼

Motion to Extend Discovery - MTED (CIV)

Comment  
Motion to Extnd Discovery Deadlines on Order Shortening Time  
(First Request)

04/10/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
Notice of Entry of Order Approving Joint Motion for  
Determination of Good Faith Settlement by Plaintiff and  
Defendant Millennium Consulting Services, LLC on Order  
Shortening Time

04/10/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
Notice of Entry of Order Granting Plaintiff's Motion to File  
Confession of Judgment Under Seal

04/17/2019 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment  
Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan,  
Basil Dibsie And Linda Mattoon s Opposition To The Motion To  
Extend Discovery Deadlines On Order Shortening Time (First  
Request)/Counter-motion To Extend Discovery Deadlines

04/17/2019 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment  
Unite Here Health and Nevada Health Solutions, LLC's  
Opposition to Plaintiff's Motion to Extend Discovery Deadlines on  
Order Shortening Time (First Request)/Counter-motion to Extend  
All Remaining Deadlines and Trial

04/19/2019 Joinder ▼

Joinder - JOIN (CIV)

Comment  
Defendants Insuremonkey s And Alex Rivlin s Joinder To Unite  
Here Health And Nevada Health Solutions, LLC s Opposition To  
Plaintiff s Motion To Extend Discovery Deadlines On Order  
Shortening Time (First Request)/Counter-motion To Extend All  
Remaining Deadlines And Trial

04/23/2019 Joinder to Opposition to Motion ▼

Joinder to Opposition to Motion - JOPP (CIV)

**1723**  
107

## Comment

Defendants, Larson & Company, P.c., Martha Hayes, and  
Dennis T. Larson's Joinder to Unite Here Health Solutions, LLC's  
Opposition to Motion to Extend Discovery Deadlines on Order  
Shortening Time (First Request)/Counter motion to Extend All  
Remaining Deadline and Trial

04/25/2019 Motion to Seal/Redact Records ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

Motion to Seal Settlement Agreement Attached as Exhibit "A" to the  
Settling Parties' "Joint Motion for Determination of Good Faith  
Settlement by Plaintiff and Defendant Millennium Consulting Services,  
Llc on Order Shortening Time

04/25/2019 Motion to Extend Discovery ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

Motion to Extend Discovery Deadlines on Order Shortening Time  
( First Request)

04/25/2019 All Pending Motions ▼

Minutes - All Pending Motions

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Matter Heard

## Parties Present ▲

Plaintiff

Attorney: Prunty, Donald L.

Defendant

**1724**  
108

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

05/01/2019 Amended Order Setting Jury Trial ▼

Amended Order Setting Jury Trial - ARJT (CIV)

Comment

Amended Order Setting Jury Trial

05/14/2019 Calendar Call ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

11:00 AM

Cancel Reason

Vacated - per Judge

05/20/2019 Jury Trial ▼

**1725**

**109**



Judicial Officer  
Williams, Timothy C.

Hearing Time  
05:00 PM

Cancel Reason  
Vacated - per Judge

05/20/2019 Order Granting ▼

Order Granting - ORDG (CIV)

Comment

Order Granting Motion to Seal Settlement Agreement Attached as Exhibit "A: to the Settling Parties' Joint Motion for Determination of Good Faith Settlement by Pltf and Dft Millennium Consulting

06/25/2019 Answer to Amended Complaint ▼

Answer to Amended Complaint - ANAC (CIV)

Comment

Defendants InsureMonkey, Inc.'s And Alex Rivlin's Answer to Plaintiffs Amended Complaint

07/18/2019 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order regarding expert disclosure deadline

07/22/2019 Notice of Entry ▼

Notice of Entry - NEO (CIV)

Comment

Notice of Entry of Order

07/30/2019 Answer to Amended Complaint ▼

Answer - ANS (CIV)

Comment

Nevada Health Solutions, LLC's Answer to Amended Complaint

08/16/2019 Substitution of Attorney ▼

Substitution of Attorney - SUBT (CIV)

Comment

Substitution of Counsel for Defendants Unite Here Health and Nevada Health Solutions, LLC

08/21/2019 Motion to Stay ▼

**1726**  
**110**

## Motion to Stay - MSTY (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Motion to Stay on Order Shortening Time

## 08/21/2019 Motion to Extend ▼

## Motion to Extend - MEX (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Motion to Extend Expert Disclosure Deadline on Order  
Shortening Time

## 08/21/2019 Appendix ▼

## Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and  
Nevada Health Solutions, LLC's Motion to Extend Expert  
Disclosure Deadline on Order Shortening Time

## 08/21/2019 Errata ▼

## Errata - ERR (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Errata to their Motion to Extend Expert Disclosure  
Deadline

## 08/21/2019 Motion to Seal/Redact Records ▼

## Motion to Seal/Redact Records - MSRC (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Motion to Seal Exhibit H, Filed with Defendants' Errata to  
Their Motion to Extend Expert Disclosure Deadline

## 08/22/2019 Clerk's Notice of Hearing ▼

## Clerk's Notice of Hearing - CNOC (CIV)

## Comment

Notice of Hearing

## 08/22/2019 Filed Under Seal ▼

## Comment

Exhibit H to Defendants Unite Here Health and Nevada Health  
Solutions, LLC's Errata to Their Motion to Extend Expert  
Disclosure Deadline sealed per 8/21/19 Defendants Unite Here

**1727****111**

Health and Nevada Health Solutions, LLC's Motion to Seal Exhibit H, Filed with Defendants' Errata to Their Motion to Extend Expert Disclosure Deadline

08/23/2019 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosures on Order Shortening Time

08/23/2019 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Stay on Order Shortening Time

08/23/2019 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosures on Order Shortening Time

08/26/2019 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Defendants InsureMonkey, Inc. And Alex Rivlin's Joinder To Defendants Unite Here Health And Nevada Health Solutions, LLC's Motion To Extend Expert Disclosure Deadline

08/26/2019 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Defendants Insuremonkey, Inc. And Alex Rivlin's Joinder To Defendants Unite Here Health And Nevada Health Solutions, LLC's Motion To Stay

08/26/2019 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment

Plaintiff's Opposition to Defendant Unite Here Health And Nevada Health Solutions, LLC's Motion to Stay on Order Shortening Time

**1728**

112

08/26/2019 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment

Opposition to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosure Deadline on Order Shortening Time

08/27/2019 Motion to Stay ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Matter Continued

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Stay on Order Shortening Time

08/27/2019 Motion ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Decision Made

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosure Deadline on Order Shortening Time (First Request)

08/27/2019 Joinder ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Decision Made

Comment

Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosures on Order Shortening Time

08/27/2019 Joinder ▼

**1729**

**113**

Judicial Officer  
Williams, Timothy C.

Hearing Time  
9:00 AM

Result  
Matter Continued

Comment  
Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Stay on Order Shortening Time

08/27/2019 Joinder ▼

Judicial Officer  
Williams, Timothy C.

Hearing Time  
9:00 AM

Result  
Decision Made

Comment  
Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosures on Order Shortening Time

08/27/2019 All Pending Motions ▼

Minutes - All Pending Motions

Judicial Officer  
Williams, Timothy C.

Hearing Time  
9:00 AM

Result  
Matter Heard

Parties Present ▲  
Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Liebman, Joseph A.

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Liebman, Joseph A.

09/10/2019 Motion for Leave to File ▼

Motion for Leave to File - MLEV (CIV)

Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Motion for Leave to File Oversized Supplemental Brief on  
Motion to Stay

09/10/2019 Supplemental Brief ▼

Supplemental Brief - SB (CIV)

Comment

Defendants Unite Here Health and Nevada Health Solutions,  
LLC's Supplemental Brief on Motion to Stay

09/10/2019 Appendix ▼

Appendix - APEN (CIV)

Comment

Appendix of Exhibits to Defendants Unite Here Health and  
Nevada Health Solutions, LLC's Supplemental Brief on Motion to  
Stay - Volume 1 of 3

09/10/2019 Appendix ▼

**1731**

**115**

## Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Supplemental Brief on Motion to Stay - Volume 2 of 3

## 09/10/2019 Appendix ▼

## Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Supplemental Brief on Motion to Stay - Volume 3 of 3

## 09/19/2019 Order Shortening Time ▼

## Order Shortening Time - OST (CIV)

## Comment

Order Shortening Time on Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Oversized Supplemental Brief on Motion to Stay

## 09/24/2019 Supplemental ▼

## Supplemental - SUPP (CIV)

## Comment

Supplemental Response to Defendants Unite Here Health and Nevada Health Solutions, LLC's Supplemental Brief on Motion to Stay

## 09/25/2019 Motion to Seal/Redact Records ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Seal Exhibit H, Filed with Defendants' Errata to Their Motion to Extend Expert Disclosure Deadline

## 09/25/2019 Motion for Leave ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

**1732**

**116**

## Result

Motion Granted

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Oversized Supplemental Brief on Motion to Stay

09/25/2019 All Pending Motions ▼

All Pending Motions

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Matter Heard

Parties Present ▲

Defendant

Attorney: Liebman, Joseph A.

Defendant

Attorney: Liebman, Joseph A.

09/30/2019 Reply ▼

Reply - RPLY (CIV)

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Reply in Support of Their Supplemental Brief on Motion to Stay

09/30/2019 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

Comment

Order Granting Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Expert Disclosure Deadline

09/30/2019 Order ▼

Order - ORDR (CIV)

Comment

Order on Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Stay

09/30/2019 Motion for Summary Judgment ▼

Motion for Summary Judgment - MSJD (CIV)

**1733**

**117**



Comment  
 Insuremonkey, Inc.'s And Alex Rivlin's Motion For Summary  
 Judgment And Declaratory Relief

09/30/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
 Notice of Entry of Order on Defendants Unite Here Health and  
 Nevada Health Solutions, LLC's Motion to Stay

09/30/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
 Notice of Entry of Order Granting Defendants Unite Here Health  
 and Nevada Health Solutions, LLC's Motion to Extend Expert  
 Disclosure Deadline

10/01/2019 All Pending Motions ▼

Minutes - All Pending Motions

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Matter Heard

Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bailey, John R

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

**1734**

**118**

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

10/01/2019 Pretrial/Calendar Call ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

10:30 AM

Cancel Reason

Vacated - per Judge

10/01/2019 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

10/14/2019 Jury Trial ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

Cancel Reason

Vacated - per Judge

10/15/2019 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Extend Time for Plaintiff to Respond to InsureMonkey, Inc. and Alex Rivlin's Motion for Summary Judgment and Delcaratory Relief

10/15/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

**1735**

**119**

Comment

Notice of Entry of First Stipulation and Order to Extend Time for Plaintiff to Respond to InsureMonkey and Alex Rivlin's Motion for Summary Judgment

10/17/2019 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment

Plaintiff's Opposition to InsureMonkey, Inc. and Alex Rivlin's Motion for Summary Judgment and Declaratory Relief

10/23/2019 Order Granting ▼

Order Granting - ORDG (CIV)

Comment

Order Granting Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Seal Exhibit H, Filed with Defendants' Errata to their Motion to Extend Expert Disclosure Deadline

10/23/2019 Order Granting ▼

Order Granting - ORDG (CIV)

Comment

Order Granting Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Oversized Supplemental Brief on Motion to Stay

10/24/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Granting Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Seal Exhibit H, Filed with Defendants' Errata to their Motion to Extend Expert Disclosure Deadline

10/24/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order Granting Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Oversized Supplemental Brief on Motion to Stay

10/29/2019 Motion in Limine ▼

Motion in Limine - MLIM (CIV)

**1736**  
120

## Comment

(12/3/19 Withdrawn) Management Defendants' Motion in Limine No. 1 Regarding Trial Testimony of the Following: 1) Barbara D. Richardson 2) Andrew Brignone 3) Cara Elias (Sterling) 4) Annette James 5) Darryl Landahl 6) Glenn L Goodnough 7) Amy Parks 8) Peter Rao 9) Michael Katgbak 10) Mark Bennett 11) Kristen Johnson

10/29/2019 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

## Comment

Notice of Hearing

11/01/2019 Status Report ▼

Status Report - SR (CIV)

## Comment

Management Defendants' Status Report Pursuant to the October 1, 2019 Hearing

11/01/2019 Status Report ▼

Status Report - SR (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Status Report

11/06/2019 Status Check ▼

Minutes - Status Check

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Trial Date Set

Comment

Status Check: Supplemental Expert Disclosures/Trial Setting

Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

**1737**  
121

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

11/08/2019 Opposition to Motion in Limine ▼

Opposition to Motion in Limine - OML (CIV)

Comment

Opposition to Management Defendants' Motion in Limine No. 1  
Regarding Trial Testimony of the Following: Barbara D  
Richardson, Andrew Brignone, Cara Elias (Sterling), Annette  
James, Darryl Landahl, Glenn L Goodnough, Amy Parks, Peter  
Roa, Michael Katigbak, Mark Bennett, Kristen Johnson

11/12/2019 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment  
 Stipulation And Order To Continue Hearing On Defendants  
 InsureMonkey, Inc And Alex Rivlin's Motion For Summary  
 Judgment And Declaratory Relief

11/12/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment  
 Notice Of Entry Of Order

11/19/2019 Notice of Rescheduling of Hearing ▼

Notice of Rescheduling of Hearing - NORH (CIV)

Comment  
 Notice of Rescheduling of Motion in Limine Hearing

11/19/2019 Amended Order Setting Jury Trial ▼

Amended Order Setting Jury Trial - ARJT (CIV)

Comment  
 3rd Amended Order Setting Jury Trial, Pre-Trial, Calendar Call,  
 and Deadlines for Motions; Amended Discovery Scheduling  
 Order

11/20/2019 Status Check ▼

Minutes - Status Check

Judicial Officer  
 Williams, Timothy C.

Hearing Time  
 9:00 AM

Result  
 Decision Made

Comment  
 Status Check: Scheduling Order/Agreement by the Parties

Parties Present ▲  
 Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

11/20/2019 Affidavit of Service ▼

Affidavit of Service - AOS (CIV)

Comment

Affidavit of Service

12/02/2019 Amended Order ▼

Amended Order - AMOR (CIV)

Comment

Amended Discovery Scheduling Order

12/03/2019 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Withdraw Without Prejudice  
Management Defendants' Motion in Limine No. 1

**1740**  
**124**

12/03/2019 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Order

12/04/2019 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Allow Certain Individuals Access to Documents Marked "Highly Confidential - Attorneys' Eyes Only"

12/04/2019 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Stipulation and Order to Allow Certain Individuals Access to Documents Marked "Highly Confidential - Attorneys' Eyes Only"

12/11/2019 Notice of Rescheduling of Hearing ▼

Notice of Rescheduling of Hearing - NORH (CIV)

Comment

Notice of Rescheduling Hearing

12/13/2019 Reply to Opposition ▼

Reply to Opposition - ROPP (CIV)

Comment

Reply To Plaintiff's Opposition To InsureMonkey, Inc and Alex Rivlin's Motion For Summary Judgment And Declaratory Relief

01/08/2020 Motion in Limine ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Cancel Reason

Vacated - per Stipulation and Order

Comment

Management Defendants' Motion in Limine No. 1 Regarding Trial Testimony of the Following: 1) Barbara D. Richardson 2) Andrew Brignone 3) Cara Elias (Sterling) 4) Annette James 5) Darryl Landahl 6) Glenn L Goodnough 7) Amy Parks 8) Peter Rao 9) Michael Katgbak 10) Mark Bennett 11) Kristen Johnson

**1741**  
**125**



01/09/2020 Pretrial/Calendar Call ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Cancel Reason

Vacated

01/23/2020 Second Amended Scheduling Order ▼

Order - ORDR (CIV)

Comment

Second Amended Discovery Scheduling Order

01/23/2020 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Amended Stipulation and Order to Allow Certain Individuals  
Access to Documents Marked "Highly Confidential - Attorneys'  
Eyes Only"

01/24/2020 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

Comment

Notice of Entry of Second Amended Scheduling Order

01/24/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Amended Stipulation and Order to Allow  
Certain Individuals Access to Documents Marked "Highly  
Confidential - Attorneys' Eyes Only"

01/27/2020 Jury Trial ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

Cancel Reason

Vacated

**1742**

126

01/29/2020 Motion for Summary Judgment ▼

Minutes - Motion for Summary Judgment

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

Result

Denied Without Prejudice

Comment

Insuremonkey, Inc.'s And Alex Rivlin's Motion For Summary Judgment And Declaratory Relief

Parties Present ▲

Plaintiff

Attorney: Prunty, Donald L.

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Liebman, Joseph A.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Wong, Jonathan K.

Defendant

Attorney: Liebman, Joseph A.

02/10/2020 Motion ▼

Motion - MOT (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Deadline for Defendants' Expert Disclosures on Order Shortening Time (Second Request)

02/10/2020 Appendix ▼

Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Deadline for Defendants' Expert Disclosures on Order Shortening Time

02/24/2020 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

## Comment

Plaintiff's Opposition to Defendants United Here Health and Nevada Health Solutions, LLC's Motion to Extend Deadline for Defendants' Expert Disclosures on OST (Second Request)

03/04/2020 Motion to Extend Discovery ▼

Minutes - Motion to Extend Discovery

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Moot

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Extend Deadline for Defendants' Expert Disclosures on Order Shortening Time (Second Request)

Parties Present ▲

Plaintiff

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

**1744**  
**128**

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bailey, John R

Attorney: Bonham, Suzanna C.

Attorney: Mata, Emma

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

Attorney: Mata, Emma

03/04/2020 Stipulation and Order to Extend Discovery Deadlines ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Extend Discovery Deadlines [Third Request]

03/05/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Stipulation and Order to Extend Discovery Deadlines [Third Request]

03/25/2020 Stipulation and Order to Extend Discovery Deadlines ▼

Stipulation and Order to Extend Discovery Deadlines - SOED (CIV)

Comment

Stipulation and Order to Extend Discovery Deadlines (Fourth Request) and Order Setting Status Check

03/25/2020 Notice of Hearing ▼

**1745**  
**129**

Notice of Hearing - NOH (CIV)

Comment

Notice of Hearing

03/25/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Stipulation and Order to Extend Discovery  
Deadlines [Fourth Request] and Order Setting Status Check

04/13/2020 Motion to Compel ▼

Motion to Compel - MCOM (CIV)

Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette  
Bond, Tom Zumbotel, and Kathleen Silver's Motion to Compel  
Production of Lynn Fulstone Documents

04/14/2020 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

04/17/2020 Minute Order ▼

Minute Order

Judicial Officer

Williams, Timothy C.

Hearing Time

8:00 AM

Result

Minute Order - No Hearing Held

Comment

re: 4/30/20 Hearing

04/22/2020 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Joinder by Defendants Unite Here Health and Nevada Health  
Solutions, LLC in Defendants Pamela Egan, Basil Dibsie, Linda  
Mattoon, Bobbette Bond, Tom Zumtobel, and Kathleen Silver's  
Motion to Compel Production of Lynn Fulstone Documents

04/22/2020 Joinder To Motion ▼

Joinder - JOIN (CIV)

**1746**  
**130**

## Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Joinder to Unite Here Health and Nevada Health Solutions, LLC's Joinder to Motion to Compel Production of Lynn Fulstone Documents

04/27/2020 Opposition to Motion to Compel ▼

Opposition to Motion to Compel - OMCM (CIV)

## Comment

Plaintiff's Opposition to Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumtobel, and Kathleen Silver's Motion to Compel Production of Lynn Fulstone Documents and Response to Joinder of NHS/UHH and Joinder Thereto

04/28/2020 Status Report ▼

Status Report - SR (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Status Report in Anticipation of Telephonic Status Check Hearing Set for April 30, 2020

04/30/2020 Status Check ▼

Minutes - Status Check

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Result

Trial Date Set

## Comment

Status Check re Trial Rescheduling based on 3/25/20 SAO to Extend Discovery Deadlines

Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

Defendant

Attorney: Brown, Russell B

**1747**  
131

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Pruitt, Mathew, ESQ

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

Attorney: Liebman, Joseph A.

05/13/2020 Stipulation and Order to Extend Discovery Deadlines ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order to Extend Discovery Deadlines (Fifth Request)

05/13/2020 Amended Order Setting Jury Trial ▼

Amended Order Setting Jury Trial - ARJT (CIV)

Comment

4th Amended Order Setting Jury Trial

05/14/2020 Notice of Rescheduling of Hearing ▼

Notice of Rescheduling of Hearing - NORH (CIV)

Comment

Notice of Rescheduling Hearing

**1748**

**132**

05/18/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

Notice of Entry of Stipulation and Order to Extend Discovery  
Deadlines [Fifth Request]

06/08/2020 Minute Order ▼

Minute Order

Judicial Officer

Williams, Timothy C.

Hearing Time

8:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order re: Hearing on 6/17/20 at 9:30 a.m.

06/11/2020 Motion to Seal/Redact Records ▼

Motion to Seal/Redact Records - MSRC (CIV)

Comment

Defendant's Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette  
Bond, Tom Zumtobel, and Kathleen Silver's Motion to Seal Reply  
in Support of Motion to Compel Production of Lynn Fulstone  
Documents on Order Shortening Time

06/15/2020 Minute Order ▼

Minute Order

Judicial Officer

Williams, Timothy C.

Hearing Time

8:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order re: Hearing on 6/24/20 at 9:00 a.m.

06/15/2020 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment

Stipulation and Order Regarding Defendant's Motion to Seal The  
Reply in Support of Motion to Compel Production of Lynn  
Fulstone Documents on Order Shortening Time

**1749**  
**133**



06/15/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment

**NOTICE OF ENTRY OF ORDER**

06/16/2020 Filed Under Seal ▼

Comment

**SEALED PER ORDER WITHIN (last page) Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Reply in Support of Motion to Compel Production of Lynn Fulstone Documents (Filed Under Seal)**

06/16/2020 Joinder ▼

Joinder - JOIN (CIV)

Comment

**Joinder by Defendants Unite Here Health and Nevada Health Solutions, LLC in Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Reply in Support of Motion to Compel Productions of Lynn Fulstone Documents**

06/17/2020 Motion to Seal/Redact Records ▼

Judicial Officer

**Williams, Timothy C.**

Hearing Time

**9:00 AM**

Cancel Reason

**Vacated - per Stipulation and Order**

Comment

**Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Motion to Seal Reply in Support of Motion to Compel Production of Lynn Fulstone Documents on OST**

06/24/2020 Motion to Compel ▼

Judicial Officer

**Williams, Timothy C.**

Hearing Time

**9:00 AM**

Result

**Motion Denied**

**1750**

**134**

## Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Motion to Compel Production of Lynn Fulstone Documents

06/24/2020 Joinder ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Denied

## Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Joinder to Unite Here Health and Nevada Health Solutions, LLC's Joinder to Motion to Compel Production of Lynn Fulstone Documents

06/24/2020 Joinder ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Denied

## Comment

Joinder by Defendants Unite Here Health and Nevada Health Solutions, LLC in Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumbotel, and Kathleen Silver's Reply in Support of Motion to Compel Productions of Lynn Fulstone Documents

06/24/2020 All Pending Motions ▼

Minutes - All Pending Motions

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Matter Heard

## Parties Present ▲

Plaintiff

Attorney: Ferrario, Mark E., ESQ

**1751**  
135

Attorney: Prunty, Donald L.  
Defendant

Attorney: Brown, Russell B  
Defendant

Attorney: Brown, Russell B  
Defendant

Attorney: Brown, Russell B  
Defendant

Attorney: Pruitt, Mathew, ESQ  
Defendant

Attorney: Pruitt, Mathew, ESQ  
Defendant

Attorney: Bailey, John R  
Defendant

Attorney: Bonham, Suzanna C.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Nakamura Ochoa, Angela T.  
Defendant

Attorney: Bailey, John R

07/10/2020 Stipulation and Order ▼

Stipulation and Order - SAO (CIV)

Comment  
Stipulation and Order Allowing for Additional Affirmative  
Defenses for Certain Defendants

07/10/2020 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order - NTSO (CIV)

Comment  
 Notice of Entry of Stipulation and Order Allowing for Additional  
 Affirmative Defenses for Certain Defendants

07/17/2020 Motion ▼

Motion - MOT (CIV)

Comment  
 Defendants' Joint Motion to Extend Deadline for Defendants'  
 Expert Disclosures (And Other Associated Deadlines) Due to  
 Covid-19 Pandemic on Order Shortening Time

07/29/2020 Minute Order ▼

Minute Order

Judicial Officer

Williams, Timothy C.

Hearing Time

8:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order re: Hearing on 8/5/20 at 9:00 a.m.

07/30/2020 Opposition to Motion ▼

Opposition to Motion - OPPM (CIV)

Comment  
 Plaintiff's Opposition to Defendants United Here Health and  
 Nevada Health Solutions LLC's Motion to Extend Deadline for  
 Defendants' Expert Disclosures on Order Shortening Time (Third  
 Request)

08/04/2020 Reply in Support ▼

Reply in Support - RIS (CIV)

Comment  
 Defendants' Reply in Support of their Joint Motion to Extend  
 Deadline for Defendants' Expert Disclosures (and Other  
 Associated Deadlines) Due to COVID-19 Pandemic (Third  
 Request)

08/05/2020 Status Check ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

**1753**  
**137**

## Result

Matter Continued

## Comment

Status Check: Status of Discovery/Case Schedule

08/05/2020 Motion ▼

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Motion Granted

## Comment

DEFENDANTS JOINT MOTION TO EXTEND DEADLINE FOR  
DEFENDANTS EXPERT DISCLOSURES (AND OTHER  
ASSOCIATED DEADLINES) DUE TO COVID-19 PANDEMIC ON  
ORDER SHORTENING TIME (Third Request)

08/05/2020 All Pending Motions ▼

Minutes - All Pending Motions

## Judicial Officer

Williams, Timothy C.

## Hearing Time

9:00 AM

## Result

Minute Order - No Hearing Held

## Parties Present ▲

## Plaintiff

Attorney: Ferrario, Mark E., ESQ

Attorney: Prunty, Donald L.

## Defendant

Attorney: Brown, Russell B

## Defendant

Attorney: Brown, Russell B

## Defendant

Attorney: Brown, Russell B

## Defendant

Attorney: Pruitt, Mathew, ESQ

## Defendant

Attorney: Pruitt, Mathew, ESQ

## Defendant

**1754****138**

Attorney: Bailey, John R

Attorney: Bonham, Suzanna C.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Nakamura Ochoa, Angela T.

Defendant

Attorney: Bailey, John R

08/10/2020 Minute Order ▼

Minute Order

Judicial Officer

Williams, Timothy C.

Hearing Time

8:00 AM

Result

Minute Order - No Hearing Held

Comment

Minute Order re: Motion to Compel and Joinders

08/11/2020 Order Granting Motion ▼

Order Granting Motion - OGM (CIV)

Comment

ORDER GRANTING DEFENDANTS JOINT MOTION TO  
EXTEND DEADLINE FOR DEFENDANTS EXPERT  
DISCLOSURES (AND OTHER ASSOCIATED DEADLINES)  
DUE TO COVID-19 PANDEMIC ON ORDER SHORTENING  
TIME

08/13/2020 Notice of Entry of Order ▼

Notice of Entry of Order - NEOJ (CIV)

**1755**  
**139**

## Comment

Notice of Entry of Order Granting Defendants' Joint Motion to Extend Deadline for Defendants' Expert Disclosures (and Other Associated Deadlines) Due to Covid-19 Pandemic on Order Shortening Time

09/17/2020 Pretrial/Calendar Call ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

10:30 AM

Cancel Reason

Vacated

10/05/2020 Jury Trial ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

Cancel Reason

Vacated

10/15/2020 Motion for Leave to File ▼

Motion for Leave to File - MLEV (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Third-Party Complaint

10/15/2020 Appendix ▼

Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC s Motion for Leave to File Third-Party Complaint, Volume 1 of 2

10/15/2020 Appendix ▼

Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC s Motion for Leave to File Third-Party Complaint, Volume 2 of 2

10/16/2020 Clerk's Notice of Hearing ▼

**1756**  
140

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

10/16/2020 Motion for Leave to File ▼

Motion for Leave to File - MLEV (CIV)

Comment

Plaintiff's Motion for Leave to File Second Amended Complaint

10/16/2020 Joinder To Motion ▼

Joinder To Motion - JMOT (CIV)

Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumtobel, and Kathleen Silver's Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Third-Party Complaint

10/19/2020 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

10/19/2020 Motion to Consolidate ▼

Motion to Consolidate - MCSD (CIV)

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Consolidate Case No. A-20-816161-C

10/19/2020 Appendix ▼

Appendix - APEN (CIV)

Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Consolidate Case No. A-20-816161-C

10/20/2020 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

10/20/2020 Motion to Seal/Redact Records ▼

Motion to Seal/Redact Records - MSRC (CIV)

**1757**

141



## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to: (1) Redact the Motion to Strike Jury Demand; and (2) Seal Exhibits A, B, C, D, and E to the Appendix to the Motion to Strike Jury Demand

10/20/2020 Motion to Strike ▼

Motion to Strike - MSTR (CIV)

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand

10/20/2020 Appendix ▼

Appendix - APEN (CIV)

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand - Volume 4 of 4

10/20/2020 Temporary Seal Pending Court Approval ▼

## Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand - Filed Under Seal

10/20/2020 Temporary Seal Pending Court Approval ▼

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand - Volume 1 of 4 - Filed Under Seal

10/20/2020 Temporary Seal Pending Court Approval ▼

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand - Volume 2 of 4 - Filed Under Seal

10/20/2020 Temporary Seal Pending Court Approval ▼

## Comment

Appendix of Exhibits to Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand - Volume 3 of 4 - Filed Under Seal

10/21/2020 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

## Comment

**1758**  
**142**

## Notice of Hearing

10/21/2020 Clerk's Notice of Hearing ▼

Clerk's Notice of Hearing - CNOC (CIV)

Comment

Notice of Hearing

10/21/2020 Motion for Partial Summary Judgment ▼

Motion for Partial Summary Judgment - MPSJ (CIV)

Comment

Defendants Kathleen Silver, Bobbette Bond, Tom Zumtobel, Pam Egan, Basil Dibsie and Linda Mattoon's Motion for Partial Judgment on the Pleadings Pursuant to NRCP12(c)

11/18/2020 Motion for Leave ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Third-Party Complaint

11/18/2020 Motion for Leave ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Plaintiff's Motion for Leave to File Second Amended Complaint

11/18/2020 Joinder ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Defendants Pamela Egan, Basil Dibsie, Linda Mattoon, Bobbette Bond, Tom Zumtobel, and Kathleen Silver's Joinder to Unite Here Health and Nevada Health Solutions, LLC's Motion for Leave to File Third-Party Complaint

**1759****143**

11/18/2020 Motion to Consolidate ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Consolidate Case No. A-20-816161-C

12/02/2020 Motion to Strike ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to Strike Jury Demand

12/02/2020 Motion to Seal/Redact Records ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:00 AM

Comment

Defendants Unite Here Health and Nevada Health Solutions, LLC's Motion to: (1) Redact the Motion to Strike Jury Demand; and (2) Seal Exhibits A, B, C, D, and E to the Appendix to the Motion to Strike Jury Demand

04/22/2021 Pretrial/Calendar Call ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

10:30 AM

05/03/2021 Jury Trial ▼

Judicial Officer

Williams, Timothy C.

Hearing Time

9:30 AM

**1760**

**144**

## Financial

### Nevada Commissioner of Insurance

Total Financial Assessment	\$450.00
Total Payments and Credits	\$450.00

11/9/2017	Transaction Assessment	\$450.00
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11/9/2017	Efile Payment	Receipt # 2017-85300-CCCLK	Nevada Commissioner of Insurance	(\$450.00)
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### Milliman Inc

Total Financial Assessment	\$1,591.00
Total Payments and Credits	\$1,591.00

9/28/2017	Transaction Assessment	\$283.00
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9/28/2017	Efile Payment	Receipt # 2017-75157-CCCLK	Milliman Inc	(\$283.00)
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9/28/2017	Transaction Assessment	\$1,260.00
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9/28/2017	Efile Payment	Receipt # 2017-75210-CCCLK	Milliman Inc	(\$1,260.00)
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10/23/2017	Transaction Assessment	\$48.00
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10/23/2017	Payment (Mail)	Receipt # 2017-32749-FAM	CAIDAN MANAGEMENT COMPANY	(\$48.00)
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### Millennium Consulting Services LLC

Total Financial Assessment	\$1,507.50
Total Payments and Credits	\$1,507.50

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**145**

10/30/2017	Transaction Assessment			\$1,486.50
10/30/2017	Efile Payment	Receipt # 2017-82377-CCCLK	Millennium Consulting Services LLC	(\$1,486.50)
10/30/2017	Transaction Assessment			\$3.50
10/30/2017	Efile Payment	Receipt # 2017-82379-CCCLK	Millennium Consulting Services LLC	(\$3.50)
1/9/2018	Transaction Assessment			\$3.50
1/9/2018	Efile Payment	Receipt # 2018-02163-CCCLK	Millennium Consulting Services LLC	(\$3.50)
4/13/2018	Transaction Assessment			\$3.50
4/13/2018	Efile Payment	Receipt # 2018-25807-CCCLK	Millennium Consulting Services LLC	(\$3.50)
10/16/2018	Transaction Assessment			\$3.50
10/16/2018	Efile Payment	Receipt # 2018-68904-CCCLK	Millennium Consulting Services LLC	(\$3.50)
3/20/2019	Transaction Assessment			\$3.50
3/20/2019	Efile Payment	Receipt # 2019-17594-CCCLK	Millennium Consulting Services LLC	(\$3.50)
5/20/2019	Transaction Assessment			\$3.50

5/20/2019	Efile Payment	Receipt # 2019- 30731- CCCLK	Millennium Consulting Services LLC	(\$3.50)
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## Larson &amp; Company PC

Total Financial Assessment	\$1,483.00
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Total Payments and Credits	\$1,483.00
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11/2/2017	Transaction Assessment			\$1,483.00
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11/2/2017	Efile Payment	Receipt # 2017- 83378- CCCLK	Larson & Company PC	(\$1,483.00)
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## Larson, Dennis T

Total Financial Assessment	\$1,513.00
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Total Payments and Credits	\$1,513.00
----------------------------	------------

10/4/2017	Transaction Assessment			\$253.00
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10/4/2017	Efile Payment	Receipt # 2017- 76546- CCCLK	Larson, Dennis T	(\$253.00)
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10/17/2017	Transaction Assessment			\$1,260.00
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10/17/2017	Payment (Mail)	Receipt # 2017- 79458- CCCLK	Meyers McConnell Reisz Siderman	(\$1,260.00)
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## InsureMonkey Inc

Total Financial Assessment	\$623.00
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Total Payments and Credits	\$623.00
----------------------------	----------

6/6/2018	Transaction Assessment			\$200.00
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6/6/2018	Efile Payment	Receipt # 2018- 37799- CCCLK	InsureMonkey Inc	(\$200.00)
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6/25/2019	Transaction Assessment			\$223.00
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6/25/2019	Efile Payment	Receipt # 2019- 38760- CCCLK	InsureMonkey Inc	(\$223.00)
9/30/2019	Transaction Assessment			\$200.00
9/30/2019	Efile Payment	Receipt # 2019- 59632- CCCLK	InsureMonkey Inc	(\$200.00)
Rivlin, Alex				
	Total Financial Assessment			\$1,513.00
	Total Payments and Credits			\$1,513.00
10/10/2017	Transaction Assessment			\$1,513.00
10/10/2017	Efile Payment	Receipt # 2017- 78021- CCCLK	Rivlin, Alex	(\$1,513.00)
Nevada Health Solutions LLC				
	Total Financial Assessment			\$1,483.00
	Total Payments and Credits			\$1,483.00
10/30/2017	Transaction Assessment			\$1,483.00
10/30/2017	Efile Payment	Receipt # 2017- 82467- CCCLK	Nevada Health Solutions LLC	(\$1,483.00)
Silver, Kathleen				
	Total Financial Assessment			\$1,833.00
	Total Payments and Credits			\$1,833.00
1/18/2018	Transaction Assessment			\$1,633.00
1/18/2018	Efile Payment	Receipt # 2018- 04363- CCCLK	Silver, Kathleen	(\$1,633.00)
10/21/2020	Transaction Assessment			\$200.00
10/21/2020	Efile Payment	Receipt # 2020- 59555- CCCLK	Silver, Kathleen	(\$200.00)
Unite Here Health				
	Total Financial Assessment			\$1,260.00

**1764**  
**148**

Total Payments and Credits				\$1,260.00
10/22/2018	Transaction Assessment			\$1,260.00
10/22/2018	Efile Payment	Receipt # 2018-70432-CCCLK	Unite Here Health	(\$1,260.00)

Documents

- Document Filed - DOC
- Demand for Jury Trial - DMJT
- Notice - NOTC
- Acceptance of Service - ACSR
- Acceptance of Service - ACSR
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Motion - MOT
- Notice of Withdrawal - NOW
- Acceptance of Service - ACSR
- Acceptance of Service - ACSR
- Acceptance of Service - ACSR
- Affidavit of Service - AOS
- Notice of Appearance - NOTA
- Initial Appearance Fee Disclosure - IAFD
- Notice of Department Reassignment - NODR
- Notice of Appearance - NOTA
- Initial Appearance Fee Disclosure - IAFD
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Affidavit of Service - AOS
- Affidavit of Service - AOS



Initial Appearance Fee Disclosure - IAFD  
Joinder - JOIN  
Answer (Business Court) - ANSBU  
Minute Order  
Affidavit of Service - AOS  
Certificate of Service - CSERV  
Opposition to Motion - OPPM  
Initial Appearance Fee Disclosure - IAFD  
Motion to Dismiss - MDSM  
Notice of Appearance - NOTA  
Disclosure Statement - DSST  
Joinder - JOIN  
Initial Appearance Fee Disclosure - IAFD  
Joinder - JOIN  
Acceptance of Service - ACSR  
Joinder to Opposition to Motion - JOPP  
Initial Appearance Fee Disclosure - IAFD  
Answer - ANS  
Joinder to Opposition to Motion - JOPP  
Reply - RPLY  
Motion to Compel - MCOM  
Answer - ANS  
Notice of Department Reassignment - NODR  
Notice of Department Reassignment - NODR  
Business Court Order - BCO (CIV)  
Stipulation and Order - SAO (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Amended Affidavit of Service - AAOS (CIV)  
Order Denying Motion - ODM (CIV)  
Opposition - OPPS (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Opposition - OPPS (CIV)  
Association of Counsel - ASSC (CIV)  
Motion to Associate Counsel - MASS (CIV)  
Errata - ERR (CIV)  
Minutes - Motion to Associate Counsel  
Reply in Support - RIS (CIV)  
Order Granting Motion - OGM (CIV)  
Notice of Entry of Order - NEOJ (CIV)

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**150**

Reply - RPLY (CIV)  
Motion to Dismiss - MDSM (CIV)  
Initial Appearance Fee Disclosure - IAFD (CIV)  
Minutes - Motion to Dismiss  
Order - ORDR (CIV)  
Minutes - Motion to Compel  
Joinder - JOIN (CIV)  
Order Setting Civil Jury Trial and Calendar Call - OSCJC (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Minutes - All Pending Motions  
Stipulation and Order - SAO (CIV)  
Notice of Entry - NEO (CIV)  
Minutes - Status Check  
Substitution of Attorney - SUBT (CIV)  
Stipulation and Order - SAO (CIV)  
Order Granting Motion - OGM (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Motion - MOT (CIV)  
Motion - MOT (CIV)  
Receipt of Copy - ROC (CIV)  
Order - ORDR (CIV)  
Response - RSPN (CIV)  
Response - RSPN (CIV)  
Motion to Reconsider - MRCN (CIV)  
Minutes - Status Check  
Status Check  
Minutes - All Pending Motions  
Answer - ANS (CIV)  
Opposition to Motion - OPPM (CIV)  
Stipulation and Order - SAO (CIV)  
Reply in Support - RIS (CIV)  
Stipulation and Order - SAO (CIV)  
Minutes - Motion For Reconsideration  
Order Granting Motion - OGM (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Minutes - Minute Order  
Minute Order  
Supplement to Opposition - STO (CIV)  
Motion for Summary Judgment - MSJD (CIV)  
Stipulation and Order - SAO (CIV)

Settlement Conference  
Opposition - OPPS (CIV)  
Notice of Rescheduling of Hearing - NORH (CIV)  
Reply in Support - RIS (CIV)  
Reply to Opposition - ROPP (CIV)  
Stipulation and Order - SAO (CIV)  
Stipulation and Order - SAO (CIV)  
Order - ORDR (CIV)  
Notice of Department Reassignment - NODR (CIV)  
Notice of Department Reassignment - NODR (CIV)  
Motion to Amend Complaint - MAMC (CIV)  
Notice of Change of Hearing - NOCH (CIV)  
Errata - ERR (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Minutes - Motion For Reconsideration  
Minutes - Motion for Summary Judgment  
Order Denying Motion - ODM (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Change of Firm Name - NCFN (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry - NEO (CIV)  
Minutes - All Pending Motions  
Amended Order Setting Jury Trial - ARJT (CIV)  
Order Granting Motion - OGM (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Amended Complaint - ACOM (CIV)  
Notice of Change of Address - NCOA (CIV)  
Ex Parte Motion - EXMT (CIV)  
Motion to Dismiss - MDSM (CIV)  
Joinder To Motion - JMOT (CIV)  
Answer - ANS (CIV)  
Answer - ANS (CIV)  
Initial Appearance Fee Disclosure - IAFD (CIV)  
Opposition - OPPS (CIV)  
Minutes - Status Check  
Opposition - OPPS (CIV)  
Reply in Support - RIS (CIV)  
Notice of Hearing - NOH (CIV)  
Minutes - Status Check  
Minutes - All Pending Motions  
Answer - ANS (CIV)  
Notice of Rescheduling of Hearing - NORH (CIV)

Minutes - Status Check  
Association of Counsel - ASSC (CIV)  
Answer - ANS (CIV)  
Motion to Seal/Redact Records - MSRC (CIV)  
Order Admitting to Practice - ORAP (CIV)  
Notice - NOTC (CIV)  
Minutes - Motion to Associate Counsel  
Minutes - All Pending Motions  
Motion to Seal/Redact Records - MSRC (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Order Granting - ORDG (CIV)  
Order - ORDR (CIV)  
Motion to Extend Discovery - MTED (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Opposition to Motion - OPPI (CIV)  
Opposition to Motion - OPPI (CIV)  
Joinder - JOIN (CIV)  
Joinder to Opposition to Motion - JOPI (CIV)  
Minutes - All Pending Motions  
Amended Order Setting Jury Trial - ARJT (CIV)  
Order Granting - ORDG (CIV)  
Redacted Version  
Redacted Version  
Answer to Amended Complaint - ANAC (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry - NEO (CIV)  
Answer - ANS (CIV)  
Substitution of Attorney - SUBT (CIV)  
Motion to Stay - MSTY (CIV)  
Motion to Extend - MEX (CIV)  
Appendix - APEN (CIV)  
Errata - ERR (CIV)  
Motion to Seal/Redact Records - MSRC (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Joinder To Motion - JMOT (CIV)  
Joinder To Motion - JMOT (CIV)  
Joinder To Motion - JMOT (CIV)  
Joinder To Motion - JMOT (CIV)  
Joinder To Motion - JMOT (CIV)  
Opposition to Motion - OPPI (CIV)  
Opposition to Motion - OPPI (CIV)

Minutes - All Pending Motions  
Motion for Leave to File - MLEV (CIV)  
Supplemental Brief - SB (CIV)  
Appendix - APEN (CIV)  
Appendix - APEN (CIV)  
Appendix - APEN (CIV)  
Order Shortening Time - OST (CIV)  
Supplemental - SUPP (CIV)  
All Pending Motions  
Reply - RPLY (CIV)  
Order Granting Motion - OGM (CIV)  
Order - ORDR (CIV)  
Motion for Summary Judgment - MSJD (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Minutes - All Pending Motions  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Opposition to Motion - OPPM (CIV)  
Order Granting - ORDG (CIV)  
Order Granting - ORDG (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Motion in Limine - MLIM (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Status Report - SR (CIV)  
Status Report - SR (CIV)  
Minutes - Status Check  
Opposition to Motion in Limine - OML (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Rescheduling of Hearing - NORH (CIV)  
Amended Order Setting Jury Trial - ARJT (CIV)  
Affidavit of Service - AOS (CIV)  
Minutes - Status Check  
Amended Order - AMOR (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Notice of Rescheduling of Hearing - NORH (CIV)

**1770**  
**154**

Reply to Opposition - ROPP (CIV)  
Order - ORDR (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Minutes - Motion for Summary Judgment  
Motion - MOT (CIV)  
Appendix - APEN (CIV)  
Opposition to Motion - OPPM (CIV)  
Stipulation and Order - SAO (CIV)  
Minutes - Motion to Extend Discovery  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Stipulation and Order to Extend Discovery Deadlines - SOED (CIV)  
Notice of Hearing - NOH (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Motion to Compel - MCOM (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Minute Order  
Joinder To Motion - JMOT (CIV)  
Joinder - JOIN (CIV)  
Opposition to Motion to Compel - OMCM (CIV)  
Status Report - SR (CIV)  
Minutes - Status Check  
Stipulation and Order - SAO (CIV)  
Amended Order Setting Jury Trial - ARJT (CIV)  
Notice of Rescheduling of Hearing - NORH (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Minute Order  
Motion to Seal/Redact Records - MSRC (CIV)  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Minute Order  
Joinder - JOIN (CIV)  
Minutes - All Pending Motions  
Stipulation and Order - SAO (CIV)  
Notice of Entry of Stipulation and Order - NTSO (CIV)  
Motion - MOT (CIV)  
Minute Order  
Opposition to Motion - OPPM (CIV)  
Reply in Support - RIS (CIV)  
Minutes - All Pending Motions  
Minute Order

Order Granting Motion - OGM (CIV)  
Notice of Entry of Order - NEOJ (CIV)  
Motion for Leave to File - MLEV (CIV)  
Appendix - APEN (CIV)  
Appendix - APEN (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Motion for Leave to File - MLEV (CIV)  
Joinder To Motion - JMOT (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Motion to Consolidate - MCSD (CIV)  
Appendix - APEN (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Motion to Seal/Redact Records - MSRC (CIV)  
Motion to Strike - MSTR (CIV)  
Appendix - APEN (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Clerk's Notice of Hearing - CNOC (CIV)  
Motion for Partial Summary Judgment - MPSJ (CIV)

## Exhibit 8



*Steven D. Grierson*

ORIGINAL

**MEX (CIV)**

JOHN BAILEY

Nevada Bar No. 137

JOSEPH A. LIEBMAN

Nevada Bar No. 10125

**BAILEY ♦ KENNEDY**

8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

Telephone: 702.562.8820

Facsimile: 702.562.8821

[JBailey@BaileyKennedy.com](mailto:JBailey@BaileyKennedy.com)

[JLiebman@BaileyKennedy.com](mailto:JLiebman@BaileyKennedy.com)

SUZANNA C. BONHAM

Texas Bar No. 24012307

EMMA C. MATA

Texas Bar No. 24029470

**SEYFARTH SHAW LLP**

700 Milam, Suite 1400

Houston, Texas 77002

Telephone: (713) 225-2300

[sbonham@seyfarth.com](mailto:sbonham@seyfarth.com)

[emata@seyfarth.com](mailto:emata@seyfarth.com)

*Attorneys for Defendants*

*UNITE HERE HEALTH AND*

*NEVADA HEALTH SOLUTIONS, LLC*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

STATE OF NEVADA, EX REL.  
COMMISSIONER OF INSURANCE,  
BARBARA D. RICHARDSON, IN HER  
OFFICIAL CAPACITY AS RECEIVER FOR  
NEVADA HEALTH CO-OP,

Plaintiff,

v.

MILLIMAN, INC., a Washington Corporation;  
JONATHAN L. SHREVE, an Individual;  
MARY VAN DER HEIJDE, an Individual;  
MILLENNIUM CONSULTING SERVICES,  
LLC, a North Carolina Corporation; LARSON &  
COMPANY P.C., a Utah Professional  
Corporation; DENNIS T. LARSON, an  
Individual; MARTHA HAYES, an Individual;  
INSUREMONKEY, INC., a Nevada  
Corporation; ALEX RIVLIN, an Individual;  
NEVADA HEALTH SOLUTIONS, LLC, a  
Nevada Limited Liability Company; PAMELA

Case No. A-17-760558-C

Dept. No. XVI

**DEFENDANTS UNITE HERE HEALTH  
AND NEVADA HEALTH SOLUTIONS,  
LLC'S MOTION TO EXTEND EXPERT  
DISCLOSURE DEADLINE ON ORDER  
SHORTENING TIME**

**(First Request)**

DEPARTMENT XVI  
NOTICE OF HEARING  
DATE 8-27-19 TIME 9:00 AM  
APPROVED BY CJL

EGAN, an Individual; BASIL C. DIBSIE, an Individual; LINDA MATTOON, an Individual; TOM ZUMTOBEL, an Individual; BOBBETTE BOND, an Individual; KATHLEEN SILVER, an Individual; UNITE HERE HEALTH, is a multi-employer health and welfare trust as defined in ERISA Section 3(37); DOES I through X inclusive; and ROE CORPORATIONS I-X, inclusive,

Defendants.

**DEFENDANTS UNITE HERE HEALTH AND NEVADA HEALTH SOLUTIONS, LLC'S  
MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE  
ON ORDER SHORTENING TIME**

Defendants Unite Here Health ("UHH") and Nevada Health Solutions, LLC ("NHS") (collectively "Defendants") respectfully move the Court to extend Defendants' current deadline for disclosure of initial and rebuttal expert witnesses (the "Motion"). Defendants were served with Plaintiff's Disclosures of Expert Witnesses Pursuant to N.R.C.P. 16.1 at 12:00 am on July 31, 2019. Plaintiff designated four (4) expert witnesses, each of which relied upon thousands of documents in preparing extensive expert reports that include multiple conclusory opinions; however, in violation of Rule 16.1(b), Plaintiff failed to include significant facts and data with its experts' reports and failed to provide and/or reasonably identify hundreds of exhibits and documents relied upon by its experts that had not previously been provided. In fact, there are numerous facts, data and documents required to be produced by N.R.C.P. 16.1(b) that still remain outstanding.

Moreover, on August 5, 2019, a week after Plaintiff's expert disclosure deadline, Plaintiff produced a 39 page report titled "Special Deputy Receiver's Report for Nevada Health CO-OP, Causation and Damages for Key Vendors Unite Here Health, Nevada Health Solutions, and InsureMonkey" that is marked "DRAFT" (the "SDR Draft Report"). By virtue of the SDR Draft Report, Defendants first learned that thousands of claims were re-adjudicated; however, the Special Deputy Receiver failed to disclose the methodology used for re-adjudication of these claims, the individuals who re-adjudicated the claims, or the supporting documentation for the re-adjudication.

Even worse, the SDR Draft Report was somehow relied upon by at least one of Plaintiff's experts, Henry Osowski, despite not being timely produced on July 30, 2019. Further, the "SDR

Draft Report contains over 100 footnotes, most with documents that have not been provided to Defendants and that cannot be identified by Defendants based on the references in the report. Additionally, the Special Deputy Receiver relied on the review of over 3500 “instances” of alleged overpayments<sup>1</sup> based on the re-adjudication of claims to formulate opinions related to improper claims processing by Defendants, but failed to identify what those “instances” are or provide them to Defendants for review and testing. Notably, the last page of the report is a “List of Documents Reviewed” that fails to list any documents and instead states “COMPLETE LISTING OF DOCUMENTS TO BE PROVIDED AT A LATER DATE.” Defendants have yet to receive a complete listing of documents. Lastly, the Special Deputy Receiver states that he “relie[d] upon certain work product produced by NHC and receivership staff, with such work product to be uploaded into the applicable electronic litigation database as necessary to advise the purposes of the Receiver’s litigation.” Despite this statement, this “work product” has not been produced/uploaded and/or is not reasonably identifiable.

Due to the amount of documentation that Defendants’ experts have been unable to examine and their inability to review the thousands of claims that Plaintiff’s experts (including the Special Deputy Receiver) reviewed over the past several years, Defendants’ experts will be unable to complete their review of Plaintiff’s experts’ opinions and supporting documentation in sufficient time to provide initial and rebuttal opinions by the current deadline of August 29, 2019.<sup>2</sup> Through a separate motion, Defendants will seek to compel any and all documents and information reviewed, vetted, tested and/or relied upon by Plaintiff’s experts, including the Special Deputy Receiver, in formulating their opinions. In this Motion, Defendants request additional time to obtain this documentation (which should have been produced months ago) and provide their experts with sufficient time to review, analyze, and opine regarding these thousands of unidentified claims..

This Motion is based upon EDCR 2.35, the accompanying Memorandum of Points and Authorities, the Declaration of Suzanna C. Bonham and the supporting evidence attached hereto, and

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<sup>1</sup> See SDR Report at page 7, to be filed under seal with an errata due to Plaintiff’s “Attorney Eyes Only” designation. Defendants dispute the designation but will comply at this time.

<sup>2</sup> See Declaration of Christina Melnykovych, attached hereto as **Exhibit A**.




any oral arguments that the Court may hear.

DATED this 19th day of August, 2019.

SEYFARTH SHAW LLP

By: /s/ Suzanna C. Bonham  
SUZANNA C. BONHAM  
EMMA C. MATA

BAILEY ♦ KENNEDY

By:  *NV Bar No. 11576*  
JOHN BAILEY  
Joseph A. Liebman

*Attorneys for Defendants Unite Here Health  
and Nevada Health Solutions, LLC*

**APPLICATION FOR ORDER SHORTENING TIME**

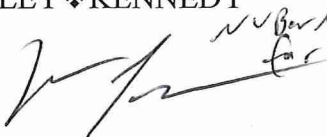
Pursuant to EDCR 2.26, Defendants hereby apply for an Order Shortening Time for their Motion to Extend Deadline for Expert Disclosures to be heard, which is based on the following Declaration of Suzanna C. Bonham.

DATED this 19th day of August, 2019.

SEYFARTH SHAW LLP

By: /s/ Suzanna C. Bonham  
SUZANNA C. BONHAM  
EMMA C. MATA

BAILEY ♦ KENNEDY

By:  *NV Bar No. 11576*  
JOHN BAILEY  
Joseph A. Liebman

*Attorneys for Defendants Unite Here Health  
and Nevada Health Solutions, LLC*

**DECLARATION OF SUZANNA C. BONHAM**

I, Suzanna C. Bonham, counsel for Defendants in the above-captioned matter, declare as follows:

1. Defendants were served with Plaintiff's Disclosures of Expert Witnesses Pursuant to N.R.C.P. 16.1 at 12:01 a.m. on July 31, 2019.

2. Plaintiff designated four (4) expert witnesses, each of which provided extensive expert reports with multiple opinions and relied upon thousands of documents, including hundreds of documents which were not produced and/or reasonably identified to Defendants with Plaintiff's expert reports or before Plaintiff's expert disclosures.

3. On August 5, 2019, a week after Plaintiff's expert disclosure deadline, Plaintiff produced a 39 page report titled "Special Deputy Receiver's Report for Nevada Health CO-OP, Causation and Damages for Key Vendors Unite Here Health, Nevada Health Solutions, and InsureMonkey" that is marked "DRAFT" and was heavily relied upon by at least one of Plaintiff's experts, Henry Osowski.

4. The Special Deputy Receiver's Report contains over 100 footnotes, most with documents that have not been provided to Defendants and that cannot be identified by Defendants based on the references in the report.

5. Additionally, the Special Deputy Receiver relied on the review of over 3500 "instances" of alleged overpayments to formulate opinions related to alleged improper claims processing by Defendants, but failed to identify what those "instances" are or provide documentation to Defendants for review and testing.

6. The last page of the report is a "List of Documents Reviewed" that fails to list any documents and instead states "COMPLETE LISTING OF DOCUMENTS TO BE PROVIDED AT A LATER DATE."

7. Defendants have yet to receive a complete listing of documents relied upon by the Special Deputy Receiver.

8. The Special Deputy Receiver states that he "relie[d] upon certain work product produced by NHC and receivership staff, with such work product to be uploaded into the applicable

1 electronic litigation database as necessary to advise the purposes of the Receiver's litigation."  
2 Despite this statement, this "work product" has not been produced/uploaded and/or is not reasonably  
3 identifiable.

4 9. Due to the amount of documentation that Defendants' experts have been unable to  
5 examine and their inability to review the thousands of claims Plaintiff's experts (including the  
6 Special Deputy Receiver) have reviewed, Defendants' experts will be unable to complete their  
7 review of Plaintiff's experts' opinions and supporting documentation in sufficient time to provide  
8 initial and rebuttal opinions by the current deadline of August 29, 2019.

9 10. An Order Shortening Time scheduling a hearing before August 29, 2019 is necessary  
10 because if this Motion is heard in the ordinary course, it will be decided after the current deadline  
11 for Defendants' Expert Disclosures. Defendants have submitted a Motion to Stay on Order  
12 Shortening Time, and request that this Motion be heard at the same hearing.

13 11. Defendants have conferred with Plaintiff regarding this Motion and Plaintiff is  
14 opposed. All other defendants agree with this Motion.

15 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is  
16 true and correct.

17  
18 EXECUTED this 19th day of August, 2019.

19  
20   
21 SUZANNA C. BONHAM  
22  
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ORDER SHORTENING TIME


THE COURT, having considered Defendants' Application for Order Shortening Time, and the Declaration of Suzanna C. Bonham in support thereof, and good cause appearing,

HEREBY ORDERS that the time for hearing DEFENDANTS' MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE be shortened, and the same shall now be heard on the 27 day of August, 2019, at 9:00 a.m., in Department XVI, or as soon thereafter as counsel can be heard.

DATED this 20 day of August, 2019.

  
DISTRICT COURT JUDGE  
CR

BAILEY ♦ KENNEDY

By:  *Bar No. 11576*  
JOHN BAILEY  
JOSEPH A. LIEBMAN

*Attorneys for Defendants Unite Here Health  
and Nevada Health Solutions, LLC*



## MEMORANDUM OF POINTS AND AUTHORITIES

### I. INTRODUCTION

On July 31, 2019, Defendants were served with Plaintiff's Disclosures of Expert Witnesses Pursuant to N.R.C.P. 16.1. Plaintiff designated four (4) expert witnesses (Henry Osowski, Mark A. Fish, Suzanne Schlernitzauer, and Joseph J. DeVito) and provided expert reports for each witness that contained multiple conclusory opinions. However, as described above, and in violation of N.R.C.P. 16.1(a)(2)(B), Plaintiff failed to include significant facts and data within its experts' reports and failed to provide and/or reasonably identify hundreds of exhibits and documents relied upon by its experts. N.R.C.P. 16.1(a)(2)(B) specifically states:

#### (2) Disclosure of Expert Testimony.

...

##### (B) Witnesses Who Must Provide a Written Report.

Unless otherwise stipulated or ordered by the court, this disclosure must be accompanied by a written report — prepared and signed by the witness — if the witness is one retained or specially employed to provide expert testimony in the case or one whose duties as the party's employee regularly involve giving expert testimony. The report must contain:

- (i) a complete statement of all opinions the witness will express, and the basis and reasons for them;
- (ii) *the facts or data considered by the witness in forming them;*
- (iii) *any exhibits that will be used to summarize or support them;*
- (iv) the witness's qualifications, including a list of all publications authored in the previous ten years;
- (v) a list of all other cases in which, during the previous four years, the witness testified as an expert at trial or by deposition; and
- (vi) a statement of the compensation to be paid for the study and testimony in the case.<sup>3</sup>

To date, Plaintiff still has not provided all the facts and data considered by each of its experts in formulating their opinions or any exhibits that will be used to summarize or support them. Plaintiff's failure to disclose is especially concerning since UHH specifically requested this information in its First Set of Requests for Production to Plaintiff, served on February 22, 2019, and

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<sup>3</sup> Nev. R. Civ. P. 16.1(a)(2)(B) (emphasis added).



1 in its First Set of Interrogatories to Plaintiff, served on March 5, 2019.<sup>4</sup>

2 Moreover, the Special Deputy Receiver's report described above (that was produced by  
3 Plaintiff a week after Plaintiff's expert disclosure deadline) contains over 100 footnotes, most with  
4 references to documents that have not been provided to Defendants and that cannot be identified by  
5 Defendants based on the references in the report.<sup>5</sup> Additionally, the Special Deputy Receiver  
6 references over 3500 "instances" of alleged overpayments relied upon to formulate opinions related  
7 to improper claims processing by Defendants,<sup>6</sup> but fails to identify what those "instances" are or  
8 provide them to Defendants for review and testing. Notably, the last page of the report is a "List of  
9 Documents Reviewed" that fails to list any documents and instead states "COMPLETE LISTING  
10 OF DOCUMENTS TO BE PROVIDED AT A LATER DATE." Defendants have yet to receive a  
11 complete listing of documents. Lastly, the Special Deputy Receiver states that he "relie[d] upon  
12 certain work product produced by NHC and receivership staff, with such work product to be  
13 uploaded into the applicable electronic litigation database as necessary to advise the purposes of the  
14 Receiver's litigation."<sup>7</sup> Despite this statement, this "work product" has not been produced/uploaded  
15 and/or is not reasonably identifiable from the approximately 2.5 million documents produced by  
16 Plaintiff.

17 Good cause exists to extend Defendants' deadline for expert disclosures, as it is necessary  
18 for Defendants' experts to review all of the supporting documents and claims information Plaintiff's  
19 experts, including the Special Deputy Receiver, relied upon in formulating their opinions.  
20 Accordingly, Defendants request that the Court extend Defendants' deadline to disclose experts and  
21 provide reports until twelve (12) months after Defendants have received all of the supporting

22 <sup>4</sup> See Defendant Unite Here Health's First Set of Requests for Production of Documents to Plaintiff at Requests Nos. 1  
23 (Please produce all documents that support your contention that NHC did not timely pay all medical claims as a result of  
24 any act or omission by UHH), 2, 65, 66, 109, 134, 172, 183 (All documents in support of your contention that NHC and/or  
25 Plaintiff was damaged as a result of any act (or omission) of UHH), 184, 185, 186, attached hereto as **Exhibit B**; see  
26 Defendant Unite Here Health's First Set of Interrogatories to Plaintiff at Nos. 1, 2, 3, 4, 7, 8, 20 (Please identify and  
describe in detail the facts and circumstances regarding UHH's alleged failure "to timely and accurately process and pay  
claims," including identification of the specific claims with respect to this interrogatory), attached hereto as **Exhibit C**;  
see Plaintiff's Responses to UHH's First Set of Interrogatories, attached hereto as **Exhibit D**.

27 <sup>5</sup> See generally SDR Report, submitted under seal with an errata.

28 <sup>6</sup> See SDR Report, at page 7 submitted under seal with an errata.

<sup>7</sup> See SDR Report, at page 3 submitted under seal with an errata.

documents and claims information they should have already produced. As stated above, a separate Motion to Compel will be filed to address Plaintiff's production deficiencies.

## II. INFORMATION REQUIRED BY EDCR 2.35(b)

### A. Discovery Completed

The volume of documents produced in this case is massive. Indeed, well in excess of 3 million pages of documents have been produced to date by the parties, and there is still a significant amount of written discovery and production outstanding.

Defendant UHH served Interrogatories and Requests for Production on Plaintiff specifically requesting information regarding experts, damages and the specific claims Plaintiff alleges were improperly processed by Defendants.<sup>8</sup> Despite assurances that responses would be provided, Plaintiff still has not provided Defendants with the requested information. In fact, Plaintiff has never provided Defendants with a calculation of damages as required by N.R.C.P. 16.1(a)(1)(A)(iv).<sup>9</sup>

Only seven depositions have taken place to date, which includes only 5 of the 18 named parties. Plaintiff's counsel has indicated its desire to take at least 17 more depositions of witnesses (many of whom reside out of state).

To date, in addition to discovery by other defendants in the case, the following written discovery has taken place between Plaintiff, UHH and NHS:

- NHS responded to Plaintiff's First Request for Production on July 18, 2018.
- UHH responded to Plaintiff's First Request for Production on December 5, 2018 and Plaintiff's First Set of Interrogatories on March 4, 2019.
- UHH has produced about 372,000 pages of documents to date with additional documents to be produced.
- NHS has produced about 1300 pages of documents to date.
- UHH propounded its First Set of Request for Production of Documents on February 22, 2019 and First Set of Interrogatories on March 5, 2019. Plaintiff served its Responses on April 12, 2019 after UHH provided NHC an extension.
- Plaintiff has produced about 2.5 million pages of documents to date.

<sup>8</sup> See Defendant Unite Here Health's First Set of Requests for Production of Documents and First Set of Interrogatories to Plaintiff, attached hereto as **Exhibits B and C**.

<sup>9</sup> See Plaintiff's 13th Supplemental Disclosures dated August 9, 2019 in which they state that they still cannot complete a total calculation of damages, attached hereto as **Exhibit E**.

- Plaintiff has served 13 supplemental disclosures with Plaintiff's 13th Supplemental Disclosure being served on August 9, 2019.

**B. Discovery to be Completed**

The following discovery remains:

- Further written discovery (interrogatories, requests for production, and requests for admission).
- Supplement of pending discovery requests with additional documents by Plaintiff, UHH and NHS in addition to third parties.
- Depositions of the pertinent witnesses related to Plaintiff and third parties.
- Expert discovery, including production of all documents and information relied upon by Plaintiff's experts.

**C. Reasons That Discovery Has Not Yet Been Completed**

As described above, there are an inordinate amount of documents at issue in this case, as it is a particularly complex matter involving thousands of claims and tens of millions of dollars in alleged damages. Moreover, Plaintiff has just now disclosed the SDR Draft Report, which indicated *for the first time* that claims were re-adjudicated throughout 2017, yet Plaintiff still has not produced the requisite underlying information regarding these thousands of claims, which Defendants' experts will need to review and evaluate.<sup>10</sup> The complexity of this case, the large volume amount of documents and information that remains to be exchanged, and the fact that a number of defendants and witnesses in the case are located in different cities and states has complicated matters and slowed down the discovery process considerably.

**D. Proposed Expert Disclosure Deadline for Defendants**

Defendants propose an extension of their expert disclosure deadline until twelve (12) months after Defendants have received all of the documents relied upon by Plaintiff's experts in order to have the opportunity to review the thousands of claims that were re-adjudicated by Plaintiff's experts or consultants.<sup>11</sup> The remaining discovery deadlines will also need to be extended accordingly.

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<sup>10</sup> See Declaration of Christina Melnykovich, attached hereto as Exhibit A.

<sup>11</sup> See Declaration of Christina Melnykovich, attached hereto as Exhibit A.

**E. Current Trial Date**

This case is set to be tried on a 6-8 week trial setting on a 5 week stack beginning January 27, 2020. Under the proposed extension of deadlines, the trial date will need to be continued to a later date.<sup>12</sup>

**III. LEGAL ARGUMENT**

Pursuant to EDCR 2.35, “[s]tipulations or motions to extend any date set by the discovery scheduling order must be in writing and supported by a showing of good cause for the extension and be received by the discovery commissioner within 20 days before the discovery cut-off date or any extension thereof.” EDCR 2.35. In this case, the discovery cut-off date is October 28, 2019 and good cause exists to extend the current expert disclosure deadlines of Defendants’ initial and rebuttal experts, as it is necessary for Defendants’ experts to review and examine all of the supporting documents and claims information Plaintiff’s experts relied upon in formulating their opinions. Specifically, in addition to the significant facts and data within its experts’ reports and the hundreds of exhibits and documents relied upon by its experts that have not yet been provided in violation of N.R.C.P. 16.1(a)(2)(B), as described above, Defendants require the opportunity to review, fully vet, and test the following categories of information relied upon by Plaintiff’s experts:

**A. Henry Osowski<sup>13</sup>**

- Emails and other correspondence cited throughout Mr. Osowski’s report that have not been produced or have not been identified with sufficient detail to allow Defendants to locate the documents.
- Documents relied upon to formulate his opinions regarding Javelina, including but not limited to, documentation pertaining to its selection, system design and testing. This information is especially necessary since Mr. Osowski asserts intentions and motives by UHH in association with system selection.<sup>14</sup>
- The documents and information he relied upon to opine that the damages computed by the Special Deputy Receiver were reasonable, including but not limited to, any and all documents relied upon and examined by the Special Deputy Receiver.

<sup>12</sup> Defendants have also filed a Motion to Stay in this case for issues unrelated to Defendants’ deadline to disclose experts; however, Defendants’ Motion to Stay, if granted, will impact a trial setting in this case and could likely impact and/or limit the type and amount of discovery that will need to be conducted in this case before trial.

<sup>13</sup> Report of Henry Osowski, attached hereto as **Exhibit F**.

<sup>14</sup> Exhibit F at 9, 17.

Specifically, Mr. Osowski states without any support or references that:

Damage amounts were computed by the Special Deputy Receiver and appear reasonable based on the work I have performed.<sup>15</sup>

**B. Suzanne Schlernitzauer**

- Documents and information reflecting the methodology employed by an unnamed “consulting firm” to identify and draw samples that she reviewed and used to form the basis of her opinions.
- Documents and information reflecting the samples she selected of the “routine diagnostic services that would normally require prior authorizations” and the statistical methodology she used for selection of the group of records.

**C. Mark Fish<sup>16</sup>**

- Documents and information reflecting the sampling processes and methodology he used in formulating his opinions.
- Documentation and information reviewed and relied upon in evaluating the calculations performed by Indegene were reasonable.

Specifically, Dr. Fish states without any support or references that:

FTI has reviewed and found to be reasonable the Indegene revised calculations of risk adjustment for year 2014.<sup>17</sup>

FTI has reviewed and found to be reasonable the revised calculations of transitional reinsurance and risk corridor for year 2014.

- Any and all information used by Indegene and the Special Deputy Receiver to perform the calculations referenced by Mr. Fish.

Specially, Mr. Fish states without any support or references that:

Table 7 below shows each of the 3R categories as filed for 2014, based on incomplete claims data, and corresponding figures recalculated using complete claims data as compiled by Indegene, a data management vendor for the risk adjustment calculation, and under the [Special Deputy Receiver’s] direction for transitional reinsurance and risk corridor calculations for year 2014.<sup>18</sup>

<sup>15</sup> Exhibit F at 44.

<sup>16</sup> Report of Mark Fish, attached hereto at **Exhibit G**.

<sup>17</sup> Exhibit G at FN60.

<sup>18</sup> Exhibit G at 22.



**D. Special Deputy Receiver (“SDR”)**

- The information, including but not limited to, claims, documentation (emails, correspondence, contracts, etc.) and notes and/or reports, used, tested and relied upon by the SDR or at his direction (or on his behalf) in the re-adjudication of claims performed.

Specifically the Special Deputy Receiver states the following despite not providing a list of the document citations, not identifying documents in footnotes and not producing/uploading to any database:

The **List of Documents Reviewed**, located at the end of this report, provides citation to the particular documents relied upon. This report also relies upon certain work product produced by NHC and receivership staff, with such work product to be uploaded into the applicable electronic litigation database as necessary to advise the purposes of the Receiver’s litigation. Footnotes to documents relied upon are also provided where necessary.<sup>19</sup>

- Documents and information reflecting any parallel claims system that was set up or developed for loading and evaluating eligibility, plan information and/or claims adjudication retrospectively, including all documents relied upon to set up same.
- Documentation and information that demonstrate all of the steps that were taken by the SDR in ascertaining that the allegations in this case are substantiated.
- Access to the re-adjudicated claims in the claim system, including the 3,549 “instances” of alleged overpayments the SDR references in the SDR Draft Report.<sup>20</sup>
- Access to Javelina and the claims adjudicated in Javelina by UHH and NHC.

It is evident from Plaintiff’s disclosures and expert reports that it had at least three (3) years to gather information and perform various activities in support of its experts’ opinions in this case. Specifically, the Receiver assumed responsibility of the CO-OP on October 15, 2015 and at least two of its experts (Fish and DeVito) were retained in 2016. Based on the amount of information reviewed, vetted, and tested by Plaintiff’s experts before providing its opinions, it would be unreasonable and prejudicial to require Defendants to review, evaluate, and rebut Plaintiff’s experts’ opinions within 30 days, especially in light of the fact that they are missing a significant portion of the information reviewed and relied upon by Plaintiff’s experts.

Defendants’ expert - Christina Melnykovich - has already been diligent in reviewing thousands of documents in this case, in addition to Plaintiff’s claims in its Amended Complaint and

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<sup>19</sup> SDR Report at 3.

<sup>20</sup> SDR Report at 7.

1 Plaintiff's expert reports and materials specifically referenced in the expert reports that have been  
2 produced. What remains to be done, however, is the review of all documents and data reviewed  
3 and/or relied upon by Plaintiff's experts as well as the documents specifically reviewed and relied  
4 upon in preparation of the SDR Draft Report to evaluate the opinions and conclusions of Plaintiff's  
5 experts and the work performed by and/or for the experts and Special Deputy Receiver, including  
6 the methodology used and individuals performing such work.<sup>21</sup> She cannot because it has not been  
7 produced. Accordingly, Defendants request (and all of the other defendants agree) that the Court  
8 should extend Defendants' current expert disclosure deadline until twelve (12) months after  
9 Defendants have received all of the supporting documents and claims information Plaintiff's experts  
10 relied upon in forming their opinions.

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28 <sup>21</sup> See Declaration of Christina Melnykovich, attached hereto as Exhibit A.

IV. CONCLUSION

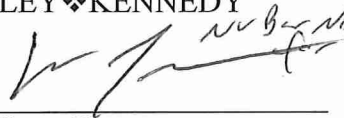
For the foregoing reasons, the Motion should be granted, and the deadline for Defendant's initial and rebuttal expert disclosures should be extended twelve (12) months after Defendants have received all of the supporting documents and claims information Plaintiff's experts relied upon in formulating their opinions (which will be addressed through a separate motion to compel).

DATED this 19th day of August, 2019.

SEYFARTH SHAW LLP

By: /s/ Suzanna C. Bonham  
SUZANNA C. BONHAM  
EMMA C. MATA

BAILEY ♦ KENNEDY

By:  *nu B-11576*  
JOHN BAILEY  
Joseph A. Liebman

*Attorneys for Defendants Unite Here Health  
and Nevada Health Solutions, LLC*



**CERTIFICATE OF SERVICE**

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 21<sup>st</sup> day of August, 2019, service of the foregoing was made by mandatory electronic service through the Eighth Judicial District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

Mark E. Ferrario, Esq.  
Eric W. Swanis, Esq.  
Donald L. Prunty, Esq.  
GREENBERG TRAURIG LLP  
3773 Howard Hughes Pkwy., Suite 400 N  
Las Vegas, NV 89169  
[ferrariom@gtlaw.com](mailto:ferrariom@gtlaw.com)  
[swanise@gtlaw.com](mailto:swanise@gtlaw.com)  
[pruntyd@gtlaw.com](mailto:pruntyd@gtlaw.com)

*Attorneys for Plaintiff*

John E. Bragonie, Esq.  
Jennifer K. Hostetler, Esq.  
LEWIS ROCA ROTHGERBER CHRISTIE  
LLP  
3993 Howard Hughes Pkwy., Suite 600  
Las Vegas, NV 89169  
[jbragonie@lrrc.com](mailto:jbragonie@lrrc.com)  
[jhostetler@lrrc.com](mailto:jhostetler@lrrc.com)

*Attorneys for Defendant  
Millennium Consulting Services LLC*

Patrick G. Byrne Esq.  
Ale L. Fugazzi, Esq.  
Aleem A. Dhalla, Esq.  
SNELL & WILMER LLP  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89189  
[pbyrne@swlaw.com](mailto:pbyrne@swlaw.com)  
[afugazzi@swlaw.com](mailto:afugazzi@swlaw.com)  
[adhalla@swlaw.com](mailto:adhalla@swlaw.com)

*Attorneys for Defendants Milliman, Inc.  
Jonathan L. Shreve and Mary van der Heijde*

Joseph P. Garin, Esq.  
Angela T. Nakamura Ochoa, Esq.  
LIPSON NEILSON, P.C.  
9900 Covington Cross Dr., Suite 120  
Las Vegas, NV 89144  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)  
[aocchoa@lipsonneilson.com](mailto:aocchoa@lipsonneilson.com)

*Attorneys for Defendants Kathleen Silver,  
Bobbette Bond, Tom Zumtobel, Pam Egan,  
Basil Dibsie and Linda Mattoon*

Kurt R. Bonds  
Matthew Pruitt  
ALVERSON TAYLOR & SANDERS  
6605 Grand Montecito Parkway, Suite 200  
Las Vegas, NV 89149  
[kbonds@alversontaylor.com](mailto:kbonds@alversontaylor.com)

*Attorneys for Defendants  
InsureMonkey, Inc. and Alex Rivlin*

Lori E. Siderman, Esq.  
Russell B. Brown, Esq.  
MEYERS McCONNELL REISZ SIDERMAN  
1745 Village Center Circle  
Las Vegas, NV 89134  
[siderman@mmrs-law.com](mailto:siderman@mmrs-law.com)  
[brown@mmrs-law.com](mailto:brown@mmrs-law.com)

*Attorneys for Defendants  
Martha Hayes and Dennis T. Larson*

  
/s/ Sharon L. Murnane  
Employee of BAILEY ♦ KENNEDY