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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Case No.: 2:26-00960

NEW HORIZON MEDICAL
SOLUTIONS, LLC, a Nevada Limited
Liability Company,

v.

Plaintiffs,

ANDERSON-TURNER NURSING,
INC., d/b/a STATERA HEALTH, a
California corporation,

Defendant.

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Defendant ANDERSON-TURNER NURSING, INC., d/b/a STATERA HEALTH and
Plaintiff NEW HORIZON MEDICAL SOLUTIONS, LLC, (collectively, the "Parties") hereby
stipulate and agree to the following:

On April 1, 2026, the Court issued an Order to Show Cause as to Jurisdiction and struck
the Certificate of Interested Parties, requiring Defendant to respond by April 29, 2026;

The Parties have conferred and agreed that Defendant shall have seven (7) days following
Defendant's filing of a response to the Order to Show Cause to answer or otherwise respond to

1 Plaintiff's Complaint, by May 6, 2026, at the latest.

2 This is the first stipulation for extension of time to answer or otherwise respond to
3 Plaintiff's Complaint.
4

5 DATED this 8th day of April, 2026.
6

7 *Respectfully submitted by:*

8 **CLARK HILL**

9 By: /William D. Schuller, Esq./ with permission attached

10 MICHAEL V. CRISTALLI, ESQ.
11 WILLIAM D. SCHULLER, ESQ.
12 1700 S. Pavilion Center Drive, Suite 500
13 Las Vegas, NV 89135
14 Attorney for Plaintiff

15 *Respectfully submitted by:*

16 **DEL GROSSO LAW, LTD.**

17 By: V. Del Grosso

18 VALERIE DEL GROSSO, ESQ.
19 Nevada Bar No. 11103
20 1509 W. Oakey Blvd.
21 Las Vegas, NV 89102
22 Attorney for Defendant
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ORDER

IT IS SO ORDERED that the deadline for Defendants to move, answer, or otherwise respond to the Complaint is up to May 6, 2026.

DATE: April 13, 2026

A handwritten signature in blue ink, appearing to read 'D. Albregts', is written over a horizontal line.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE



Valerie Del Grosso, Esq. <valerie@delgrossolaw.com>

Re: New Horizon Medical v. Statera Health

Schuller, William D. <wschuller@clarkhill.com>
To: "Valerie Del Grosso, Esq." <valerie@delgrossolaw.com>
Cc: "Cristalli, Michael" <mcristalli@clarkhill.com>

Thu, Apr 9, 2026 at 8:09 AM

You may affix my e-signature.

I am available on Friday from 1:30 to 4:30.

William D. Schuller

Senior Attorney

CLARK HILL PLC

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Las Vegas, Nevada 89135

Direct: (702) 697-7550 | Fax: (702) 778-9709

wschuller@clarkhill.com | www.clarkhill.com

From: Valerie Del Grosso, Esq. <valerie@delgrossolaw.com>
Sent: Wednesday, April 8, 2026 4:54 PM
To: Schuller, William D. <wschuller@clarkhill.com>
Cc: Cristalli, Michael <mcristalli@ClarkHill.com>
Subject: Re: New Horizon Medical v. Statera Health

EXTERNAL EMAIL: The sender (valerie@delgrossolaw.com) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Thank you. I have attached a proposed stipulation in pdf format, or you can access the editable version [here](#).

On Friday, would noon or later work for a quick call?

Thank you,

Valerie

Valerie Del Grosso Molnar

Del Grosso Law, Ltd.

On Mon, Apr 6, 2026 at 1:34 PM Schuller, William D. <wschuller@clarkhill.com> wrote:

I am fine with a stipulation and am available for a call on Friday.

William D. Schuller

Senior Attorney

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From: Valerie Del Grosso, Esq. <valerie@delgrossolaw.com>

Sent: Monday, April 6, 2026 11:57 AM

To: Schuller, William D. <wschuller@clarkhill.com>

Cc: Cristalli, Michael <mcristalli@ClarkHill.com>

Subject: Re: New Horizon Medical v. Statera Health

EXTERNAL EMAIL: The sender (valerie@delgrossolaw.com) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Hi William, the deadlines do not seem to move based on jurisdictional items. Are you open to a stipulation just to be sure?

Also, we do need to arrange a time for a joint status call. Please let me know your availability. I am free Friday if you can make that work. Valerie

Valerie Del Grosso Molnar

Del Grosso Law, Ltd.

On Fri, Apr 3, 2026, 1:19 PM Schuller, William D. <wschuller@clarkhill.com> wrote:

Good Afternoon Valerie:

Pursuant to the OSC filed Wednesday, you now have until April 29 to address the remand issue and file a certificate of interested parties. As such, I believe your request for an extension until April 16 to respond to the complaint is moot.

We will not agree to stay the case at this time. However, I am always happy to discuss settlement if your client is so inclined.

Bill Schuller

William D. Schuller

Senior Attorney

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Las Vegas, Nevada 89135

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From: Valerie Del Grosso, Esq. <valerie@delgrossolaw.com>

Sent: Friday, April 3, 2026 12:37 PM

To: Schuller, William D. <wschuller@clarkhill.com>; Cristalli, Michael <mcristalli@ClarkHill.com>

Subject: Re: New Horizon Medical v. Statera Health

EXTERNAL EMAIL: The sender (valerie@delgrossolaw.com) is external to Clark Hill. Exercise caution with links, attachments, or replies if this message is unexpected.

Good afternoon, I wanted to follow up on the request below, as well as set up a meet and confer regarding the possibility of staying the case while the claims are reviewed for insurance coverage.

Thank you,

Valerie

Valerie Del Grosso Molnar

Del Grosso Law, Ltd.

On Tue, Mar 31, 2026 at 6:30 PM Valerie Del Grosso, Esq. <valerie@delgrossolaw.com> wrote:

Good evening,

I am counsel for Defendant in New Horizon case. We removed to federal court yesterday, and the court has issued a minute order requiring a joint status report by April 30th.

The rules provide 7 days for my client to respond to the complaint from the date of removal, and I was hoping to speak with you prior to then for scheduling purposes.

In case we do not, is your client open to an extension until April 16th?

Thank you,

Valerie Del Grosso

Valerie Del Grosso Molnar

Del Grosso Law, Ltd.
