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Attorneys for Plaintiff,
NEW HORIZON MEDICAL
SOLUTIONS LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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NEW HORIZON MEDICAL SOLUTIONS
LLC, a Nevada limited-liability company,

Plaintiff,

vs.

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

Defendant.

CASE NO.: 2:26-cv-00960-APG-DJA

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

Plaintiff NEW HORIZON MEDICAL SOLUTIONS LLC (“New Horizon”), Defendant
ANDERSON TURNER NURSING INC d/b/a STATERA HEALTH (“Anderson Turner” and
with New Horizon, “Parties”), by and through their respective counsel, hereby stipulate and agree,
pursuant to FRCP 41(a):

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1 1. On May 6, 2026, Anderson Turner filed Defendant's Motion to Stay Pending
2 Outcome of Related Medical Appeals [ECF No. 15] ("Motion to Stay");

3 2. The Parties have since reached a resolution of this matter, the confidential terms of
4 which are set forth in a Settlement Agreement ("Agreement");

5 3. Any action brought to enforce or interpret the provisions of the Agreement shall be
6 brought in this action;

7 4. The Parties' settlement renders the Motion to Stay moot;

8 5. New Horizon's claims against Anderson Turner are dismissed with prejudice; and

9 6. The Parties are to bear their respective attorney's fees and costs.

10 **IT IS SO STIPULATED.**

11 Dated this 3rd day of June 2026.

Dated this 3rd day of June 2026.

12 **CLARK HILL PLC**

DEL GROSSO LAW, LTD.

13
14 /s/ William D. Schuller, Esq.
MICHAEL V. CRISTALLI, ESQ.
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/s/ Valerie Del Grosso, Esq.
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18 Attorneys for Plaintiff,
NEW HORIZON MEDICAL
19 SOLUTIONS LLC

Attorneys for Defendant,
ANDERSON TURNER NURSING INC
d/b/a STATERA HEALTH

20 **IT IS SO ORDERED:**

21 Dated: June 4, 2026

22
23 Submitted By:

24 **CLARK HILL PLC**



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE

25
26 /s/ William D. Schuller, Esq.
MICHAEL V. CRISTALLI, ESQ.
27 WILLIAM D. SCHULLER, ESQ.

28 Attorneys for Plaintiff