

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA**

GEORGE CANSLER, on his own behalf,
and on the behalf of a class of those similarly
situated,

Plaintiff,

v.

UNIVERSITY HEALTH SYSTEMS OF
EASTERN CAROLINA, INC., EAST
CAROLINA HEALTH-CHOWAN, INC.,
HALIFAX REGIONAL MEDICAL
CENTER, INC., ROANOKE VALLEY
HEALTH SERVICES, INC., PITT
COUNTY MEMORIAL HOSPITAL, INC.,
DUPLIN GENERAL HOSPITAL, INC.,
EAST CAROLINA HEALTH-
BEAUFORT, INC., EAST CAROLINA
HEALTH-BERTIE, INC., EAST
CAROLINA HEALTH-HERITAGE, INC.,
THE OUTER BANKS HOSPITAL, INC.,
VIDANT MEDICAL GROUP
AFFILIATES, LLC, VIDANT MEDICAL
GROUP, LLC, VIDANT INTEGRATED
CARE, LLC, and FIRSTPOINT
COLLECTION RESOURCES, INC.,

Defendants.

Case No. 4:22-cv-00014

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

All of the Defendants other than East Carolina Health - Heritage, Inc. (collectively "Defendants")¹, by and through their undersigned counsel, and pursuant to Federal Rule of Civil

¹ As of the date of this filing, East Carolina Health - Heritage, Inc. has not yet been served. However, counsel for East Carolina Health - Heritage, Inc. and counsel for Plaintiff are working together to effect a waiver of service.

Procedure 6(b)(1)(A), hereby file this Motion for Extension of Time to Respond to Plaintiff's Complaint and state the following in support thereof:

1. On February 18, 2022, Plaintiff filed his Complaint in the United States District Court for the Eastern District of North Carolina.
2. Defendants were served with Plaintiff's Complaint on February 28, 2022 and March 1, 2022.
3. The period in which to file and serve a response to Plaintiff's Complaint has not yet expired. Defendants' response deadline has not previously been extended.
4. Defendants need additional time to formulate an answer or otherwise respond to Plaintiff's Complaint.
5. As such, Defendants request an extension of time up to and including May 20, 2022, to file a response to Plaintiff's Complaint.
6. The additional time sought is not for purposes of delay. No parties will be prejudiced by this extension, and it will serve the interests of judicial economy.
7. Plaintiff's counsel has consented, in writing, to the requested extension of time.

WHEREFORE, Defendants respectfully requests an Order from this Honorable Court GRANTING Defendants' Motion for Extension of Time to Respond to Plaintiff's Complaint and permitting Defendants to file their response to the Complaint on or before May 20, 2022.

[SIGNATURE PAGE FOLLOWS]

Date: March 21, 2022

Respectfully submitted by:

/s/ David A. Grassi, Jr.
David A. Grassi, Jr. (N.C. Bar No. 38191)
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Counsel for Defendant FirstPoint Collection Resources, Inc.

/s/ Terrence M. McKelvey (w/ permission)
Terrence M. McKelvey (N.C. Bar No. 47940)
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Counsel for Defendants University Health Systems of Eastern Carolina, Inc.; East Carolina Health-Chowan, Inc.; Halifax Regional Medical Center, Inc.; Roanoke Valley Health Services, Inc.; Pitt County Memorial Hospital, Inc.; Duplin General Hospital, Inc.; East Carolina Health-Beaufort, Inc.; East Carolina Health-Bertie, Inc.; The Outer Banks Hospital, Inc.; Vidant Medical Group Affiliates, Inc.; Vidant Medical Group, LLC; and Vidant Integrated Care, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served upon all counsel of record via the Clerk of Court's ECF system, this the 21st day of March, 2022.

/s/ David A. Grassi, Jr. _____
The Echols Firm, LLC

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Defendants.

Case No. 4:22-cv-00014

**ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME
TO ANSWER PLAINTIFF'S COMPLAINT**

This matter came before the Court on Defendants' Motion for Extension of Time to Respond to Plaintiff's Complaint. Upon review of the file and for other good cause shown, it is hereby **ORDERED, ADJUDGED, AND DECREED:**

1. That Defendants' Unopposed Motion for Extension of Time is hereby granted.

2. Each of the Defendants, other than East Carolina Health - Heritage, Inc., shall have through and including May 20, 2022, to file their Responses to Plaintiff's Complaint.

Date: _____

Louise Wood Flanagan
United States District Judge

Copies furnished to: *All counsel of record.*