

JOHN-ANDERSON L. MEYER 8541  
JAMES W. ROONEY 11361

**DENTONS US LLP**

1001 Bishop Street, Suite 1800  
Honolulu, Hawai`i 96813  
Telephone: (808) 524-1800  
Facsimile: (808) 524-4591  
E-Mail: anderson.meyer@dentons.com  
james.rooney@dentons.com

David C. Tolley (*Pro Hac Vice*)  
William J. Trach (*Pro Hac Vice*)  
U. Gwyn Williams (*Pro Hac Vice*)

**LATHAM & WATKINS LLP**

200 Clarendon Street  
Boston, MA 02116  
Telephone: (617) 948-6000  
E-Mail: david.tolley@lw.com  
william.trach@lw.com  
gwyn.williams@lw.com

Attorneys for Plaintiff  
UNITEDHEALTHCARE INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

UNITEDHEALTHCARE  
INSURANCE COMPANY,

Plaintiff,

vs.

MAUI MEMORIAL EMERGENCY  
MEDICAL ASSOCIATES, INC.,

Defendant.

Case No. 1:26-cv-00040 DKW-WRP

**MODIFIED STIPULATION AND  
ORDER FOR SECOND EXTENSION  
OF TIME TO FILE RESPONSIVE  
PLEADING TO COMPLAINT**

Judge: Honorable Derrick K. Watson  
No Trial Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAI‘I

UNITEDHEALTHCARE  
INSURANCE COMPANY

Plaintiff,

vs.

MAUI MEMORIAL EMERGENCY  
MEDICAL ASSOCIATES, INC.

Defendant.

Case No. 1:26-cv-00040 DKW-WRP

**MODIFIED STIPULATION AND  
ORDER FOR SECOND EXTENSION  
OF TIME TO FILE RESPONSIVE  
PLEADING TO COMPLAINT**

Judge: Honorable Derrick K. Watson  
No Trial Date

**MODIFIED STIPULATION AND ORDER FOR SECOND EXTENSION OF  
TIME TO FILE RESPONSIVE PLEADING TO COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between Defendant MAUI MEMORIAL EMERGENCY MEDICAL ASSOCIATES, INC. (“Defendant”), and Plaintiff UNITEDHEALTHCARE INSURANCE COMPANY (“Plaintiff”) (collectively, the “Parties”), by and through their counsel, jointly stipulate as follows:

WHEREAS, Plaintiff filed this action on January 30, 2026 [ECF 1];

WHEREAS, Plaintiff served the Complaint on February 20, 2026;

WHEREAS, Defendant’s current deadline to respond to the Complaint is March 27, 2026;

WHEREAS, Rule LR6.2 of the Local Rule for the United States District Court of Hawaii as well as Federal Rule 6(b)(1)(a) allows for an extension of time to

respond to a complaint;

WHEREAS, good cause exists for this extension as Defendant has recently retained Buchalter LLP, who must now finalize the pro hac vice requirements and finalize local counsel arrangements with Case Lombardi, A Law Corporation;

WHEREAS, there has been one prior extension of time stipulation filed by the Parties;

WHEREAS, the Parties have agreed to an extension of one more week for Defendant to answer or otherwise respond to the Complaint in the form of a motion to dismiss;

WHEREAS, the Parties have agreed to an extension of three weeks for Plaintiff to file a reply;

IT IS HEREBY STIPULATED AND AGREED, by and between all Parties and their respective counsel, pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule LR6.2, that the deadline for Defendant to respond to the Complaint is extended to April 3, 2026. ~~and the deadline for Plaintiff to file a reply is extended to May 1, 2026.~~

//

//

//

//

DATED: Honolulu, Hawaii, March 27, 2026.

/s/ James W. Rooney

---

JOHN-ANDERSON L. MEYER  
JAMES W. ROONEY  
DAVID C. TOLLEY (*Pro Hac Vice*)  
WILLIAM J TRACH (*Pro Hac Vice*)  
U. GYWN WILLIAMS (*Pro Hac Vice*)

Attorneys for Plaintiff  
**UNITEDHEALTHCARE INSURANCE  
COMPANY**

DATED: Honolulu, Hawaii, March 27, 2026.

/s/ Steven E. Tom

---

MICHAEL L. LAM (*appearance forthcoming*)  
STEVEN E. TOM (*appearance forthcoming*)  
ANDREW H. SELESNICK (*Pro Hac Vice  
forthcoming*)  
MICHAEL B. FISHER (*Pro Hac Vice  
forthcoming*)  
DANIELLE MAYER (*Pro Hac Vice forthcoming*)

Attorneys for Defendant  
**MAUI MEMORIAL EMERGENCY  
MEDICAL ASSOCIATES, INC.**

APPROVED AND SO ORDERED **AS MODIFIED**: The Court approves this stipulation except that the Court strikes the proposed deadline for Plaintiff's reply to Defendant's anticipated motion to dismiss. Any request to modify the briefing schedule for the anticipated motion to dismiss shall be directed to the District Judge.

DATED: Honolulu, Hawaii, March 30, 2026.



A handwritten signature in black ink, appearing to be "Wes Reber Porter".

---

Wes Reber Porter  
United States Magistrate Judge

---

*UNITEDHEALTHCARE INSURANCE COMPANY* vs. *MAUI MEMORIAL EMERGENCY MEDICAL ASSOCIATES, INC.*; Case No. 1:26-cv-00040 DKW-WRP; **MODIFIED** STIPULATION AND ORDER FOR SECOND EXTENSION OF TIME TO FILE RESPONSIVE PLEADING TO COMPLAINT