

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Chua v. Neuromonitoring Associates, LLC

Chua · No. 2:25-cv-02266-JCM-MDC · Decided January 15, 2026

OPINION

Robert L. Rosenthal, Esq. 1! Nevada Bar. No. 6476 4 || John J. Savage, Esq. ~ || Nevada Bar. No. 11455 HOWARD & HOWARD ATTORNEYS PLLC 3800 Howard Hughes Parkway, Suite 1000 Las Vegas, Nevada 89169 Telephone: (702) 257-1483 ~ || E-Mail Address: rln@h2law.com 6 ys@h2law.com 7 || Matthew S. Disbrow, Esq. California State Bar No. 294764 8 || HONIGMAN LLP 2290 First National Building?

II Detroit, Michigan 48226 19 || Telephone: (313) 465-7000 E-Mail Address: mdisbrow@honigman.com 11 || Pro Hae Vice Application Forthcoming Attorneys for Neuromonitoring Associates, LLC 12 3 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA 14 15 || RACHEL CHUA, individually and on behalf of | Case No.: 2:25-cv-02266-JCM-MDC all others similarly situated, 16 Plaintiff STIPULATION AND ORDER TO STAY 7, ALL DEADLINES AND PROVIDE LIMITED EQUITABLE TOLLING 18 NEUROMONITORING ASSOCIATES, LLC, | (Action filed on November 17, 2025) 19 20 Defendants.

21 29 Plaintiff Rachel Chua ('Plaintiff') and Defendant Neuromonitoring Associates, LLC 23 || ((NMA'') (together, the Parties), by and through undersigned counsel, hereby stipulate as follows: 24 1. All current case deadlines are stayed pending the Court's decision on Defendant's 25 Motion to Dismiss for Lack of Personal Jurisdiction and Venue or, Alternatively, to Compel Arbitration, 26 filed on December 12, 2025 (the "Motion").

This stay includes the Federal Rule of Civil Procedure 27 26(f) conference, any related discovery plan and scheduling order deadlines, and all discovery and motion deadlines otherwise applicable during the pendency of the Motion. No stay applies beyond the > point of the Court's decision on the pending Motion absent further agreement of the Parties or order 6 3 || the Court.

4 a The statute of limitations applicable to Fair Labor Standards Act claims of putative > || collective members in this action is tolled only from the date this Order is entered until the date the Court issues its ruling on the Motion. No tolling applies beyond that point absent further agreement of the Parties or order of the Court. This stipulated tolling applies only to putative collective members' 9 FLSA claims asserted in this action against Defendant.

Plaintiff reserves the right to seek additional 10 || tolling in this matter, which is not part of this stipulation, and Defendant reserves all rights and defense 11 || regarding any such request for

additional tolling. 12 3. This stipulation does not constitute an admission by any party regarding any issue, 13 including those pertaining to the pending Motion, All parties preserve all claims, defenses, objections, and arguments of the Parties, including as to arbitrability, collective certification, merits, and damages, 4, If necessary, within 14 days after the Court issues its ruling on the Motion, the Parties will meet and confer and submit either a proposed discovery plan and scheduling order under Rule 26(18 || Or a joint status report advising the Court of proposed next steps consistent with the ruling.

19 5. The Parties agree that good cause exists for the stay and limited tolling set forth herei 20 II to promote judicial economy and avoid unnecessary expense while the Motion is pending. 22 23 28 i 6. On this 12 day of January, 2026, the Parties respectfully request that the Court ente 9 the Order. 3 IT IS SO STIPULATED, 411 Dated: January 12, 2026 5 Attorneys for Plaintiff Attorneys for Defendant 6 By: /s/ Anna Prakash By: _ 4s/ Robert L. Rosenthal 7 Robert L. Rosenthal, Esq.

8 LEAH L. JONES Nevada Bar. No. 6476 Nevada State Bar No. 13161 HOWARD & HOWARD ATTORNEYS PLLC 9 JOSHUA D. BUCK 3800 Howard Hughes Parkway, Suite 1000 Nevada State Bar No, 12187 Las Vegas, Nevada 89169 10 THIERMAN BUCK LAW FIRM Telephone: (702) 257-1483 325 W. Liberty Street E-Mail Address: rlr@h2law.com 1] Reno, NV 89501 Matthew S. Disbrow, Esq. Tel: 775.284.1500 California State Bar No. 294764 12 Fax: 775.703.5027 HONIGMAN LLP 13 {eal thiennanbuekeom 2290 First National Building josh@thiermanbuck.com Detroit, Michigan 48226 15 ANNA PRAKASH, MN No,'035 1362 Pro Hac Vice Application Forthcoming CAITLIN OPPERMAN, MN No. 0399978 16 NICHOLS KASTER, PLLP 80 South 8" Street 17 4700 IDS Center Minneapolis, MN 55402 Tel: 612.256.3200 Fax: 612.338.4878 19 srey@nka.com 20 aprakash@nka.com copperman@nka.com 2] Admitted Pro Hac Vice 22 ORDER 23 74 ||Future filings must be filed in searchable IT IS SO ORDERED: pdf. format per LR IA 10-1(b).

Filings OA o~ 25 |}which do not comply with LR IA 10-1(b) poy) may be denied or rejected. got fi f- 26 Hon, jaaximi ye od DCouvillier, IT 97 United States' apistrate Judge DATED: January 15, 2026