

1 Joshua M. Halen (NSBN 13885)
2 HOLLAND & HART LLP
3 5470 Kietzke Lane, Suite 100
4 Reno, NV 89511
5 Tel: (775) 327-3000
6 Fax: (775) 786-6179
7 jmhalen@hollandhart.com

1183-11-1
7005 AUG 25 PM 4:12
m

5 Christopher M. Jackson (*pro hac vice* forthcoming)
6 HOLLAND & HART LLP
7 555 17th Street, Suite 3200
8 Denver, CO 80202
9 Tel: (303) 295-8000
10 cmjackson@hollandhart.com

11 *Attorneys for Plaintiffs*

12 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
13 **IN AND FOR CARSON CITY**

14 NATIONAL TAXPAYERS UNION, a non-
15 profit organization, and ROBIN L. TITUS,
16 MD,

17 Case No. 25 OC 00109 1B

18 Dept. No. 1

19 Plaintiffs,

20 v.

21 THE STATE OF NEVADA, ex, rel., JOSEPH
22 LOMBARDO, in his official capacity as
23 Governor of the State of Nevada; ZACH
24 CONINE, in his official capacity as Nevada
25 State Treasurer; RICHARD WHITLEY, in his
26 official capacity as Director of the Nevada
27 Department of Health and Human Services;
28 SCOTT J. KIPPER, in his official capacity as
the Nevada Commissioner of Insurance; and
RUSSELL COOK, in his official capacity as
Executive Director of the Silver State Health
Insurance Exchange,

Defendants.

23
24 **REQUEST FOR SUBMISSION OF STIPULATION REGARDING FIRST AMENDED**
25 **COMPLAINT AND BRIEFING SCHEDULE AND ORDER**

26 Plaintiffs National Taxpayers Union and Robin L. Titus, MD (collectively "Plaintiffs"),
27 by and through counsel, Holland & Hart LLP, hereby requests that the Stipulation Regarding
28

1 First Amended Complaint and Briefing Schedule and Order, filed on August 25, 2025, be
2 submitted to the Court for decision.

3 DATE: August 25, 2025

4 HOLLAND & HART LLP

5
6 Joshua M. Halen (NSBN 13885)
7 5470 Kietzke Lane, Suite 100
8 Reno, NV 89511
9 Tel: (775) 327-3000
Fax: (775) 786-6179

10 Christopher M. Jackson (*pro hac vice* forthcoming)
11 555 17th Street, Suite 3200
12 Denver, CO 80202
13 Tel: (303) 295-8000
Fax: (303) 295-8261

14 *Attorneys for Plaintiffs*

15 HOLLAND & HART LLP
16 5441 KIETZKE LANE
17 SECOND FLOOR
18 RENO, NV 89511

CERTIFICATE OF SERVICE

I, Cathy Ryle, certify:

I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of Holland & Hart LLP. My business address is 5470 Kietzke Lane, Suite 100, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

On August 25, 2025, I caused the foregoing **REQUEST FOR SUBMISSION OF STIPULATION REGARDING FIRST AMENDED COMPLAINT AND BRIEFING SCHEDULE AND ORDER** to be served by the following methods(s):

U.S. Mail: a true and correct copy was placed in Holland & Hart LLP's outgoing mail in a sealed envelope addressed as follows:

Jeffery M. Conner (NSBN 11543)
Chief Deputy Solicitor General
State of Nevada
Office of the Attorney General
100 North Carson St
Carson City, Nevada 89701-4717
Tel: (775) 684-1136
jconner@ag.nv.gov

E-Mail: By e-mailing a true copy thereof to the following person(s) at the following e-mail addresses, pursuant to NRCP 5(b)(F):

Jeffery M. Conner (ISBN 11543)
Chief Deputy Solicitor General
jconner@ag.nv.gov

Cathy Ryle
An Employee of Holland & Hart LLP

35653096_v1