

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

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

8 *Attorneys for Plaintiffs*

9
10 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
IN AND FOR CARSON CITY

11 NATIONAL TAXPAYERS UNION, a non-
12 profit organization, and ROBIN L. TITUS,
MD,

13
14 Plaintiffs,

15 v.

16 THE STATE OF NEVADA, ex, rel., JOSEPH
LOMBARDO, in his official capacity as
Governor of the State of Nevada; ZACH
17 CONINE, in his official capacity as Nevada
State Treasurer; RICHARD WHITLEY, in his
18 official capacity as Director of the Nevada
Department of Health and Human Services;
19 SCOTT J. KIPPER, in his official capacity as
the Nevada Commissioner of Insurance; and
20 RUSSELL COOK, in his official capacity as
Executive Director of the Silver State Health
21 Insurance Exchange,

22 Defendants.

Case No. 25 OC 00109 1B

Dept. No. 1


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

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

17 *Attorneys for Plaintiffs*
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 (NSBN 11543)
Chief Deputy Solicitor General
jconner@ag.nv.gov


Cathy Ryle
An Employee of Holland & Hart LLP

35653096_v1

HOLLAND & HART LLP
5441 KIETZKE LANE
SECOND FLOOR
RENO, NV 89511