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2 JEFFREY M. CONNER (Bar No. 11543)  
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*Attorneys for Defendants*

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SCOTT HOEN  
CLERK

DEPUTY

8 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
9 **IN AND FOR THE CARSON CITY**

10 NATIONAL TAXPAYERS UNION, a non-  
profit organization, and ROBIN TITUS,  
11 MD,

Case No. 25 OC 00109 1B

Dept. No. 1

12 Plaintiffs,

13 vs.

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

22 Defendants.

23 **DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**  
24 **(SECOND REQUEST)**

25 Defendants, by and through counsel, AARON D. FORD, Attorney General of the  
26 State of Nevada and JEFFREY M. CONNER, Chief Deputy Solicitor General, hereby  
27 respectfully moves this Court for an order granting a seven (7) day enlargement of time,

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1 to and including August 25, 2025, in which to file and serve their response to the motion  
2 for preliminary injunction.

3 This motion is brought under FJDCR 3.17, as well as the attached declaration of  
4 counsel and all other papers, documents, records, pleadings and other materials on file  
5 herein.

6 RESPECTFULLY SUBMITTED this 18th day of August, 2025.

7 AARON D. FORD  
8 Attorney General

9 By:

  
10 JEFFREY M. CONNER (Bar. No. 11543)  
11 Chief Deputy Solicitor General  
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1. I am an attorney employed by the Office of the Attorney General of the State of Nevada, and I make this declaration on behalf of Defendants' motion for enlargement of time in the above-captioned matter.

3. This request is necessary for two reasons. First, Defendants need additional time to complete the response to the motion for preliminary hearing. In particular, my ability to complete the motion has been hampered by the fact that two of the named defendants no longer serve in the official capacity in which they were sued. Although the named defendants are automatically substituted for under Nev. R. Civ. P. 25(d), the change has required additional communications with new clients in preparing the response to the motion for preliminary injunction that I had not accounted for when I sought the first extension of time. Second, I also had a conversation with opposing counsel today to discuss an issue I identified in the complaint that likely requires the filing of an amendment complaint. And we are in continued discussions about whether an amendment is necessary, which would also likely require re-filing of the motion for preliminary injunction. For that reason, this extension will also work to everyone's benefit because it may avoid the need for an unnecessary round of briefing. And if an amendment is necessary, counsel will work together to agree on a briefing schedule that keeps this case on track and moving forward.

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5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

I declare under penalty of perjury that the foregoing is true and correct.

By:

**JEFFREY M. CONNER** (Bar. No. 11543)  
Chief Deputy Solicitor General

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General and that on  
3 this 18th day of August, 2025, I caused to be deposited for mailing a true and correct copy  
4 of the foregoing, **DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF**  
5 **TIME (SECOND REQUEST)**, to the following:

6 Joshua M. Halen (NSBN 13885)  
7 HOLLAND & HART LLP  
8 5470 Kietzke Lane, Suite 100  
9 Reno, NV 89511

10 Christopher M. Jackson  
11 HOLLAND & HART LLP  
12 555 17th Street, Suite 3200  
13 Denver, CO 80202

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16 Amanda White  
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2025 JUL 31 AM 7:46

WILLIAM S. TUTTLE

*Handwritten signature*

**IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
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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.

**ORDER**

Defendants have filed an unopposed motion seeking an extension of time to  
respond to the motion for preliminary injunction to and including August 18, 2025.

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1 Good cause appearing, the unopposed motion is **GRANTED**. It is **ORDERED** that  
2 Defendants shall have until August 18, 2025, to respond to the motion for preliminary  
3 injunction.

4 Dated this 31<sup>st</sup> day of July, 2025

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6   
District Court Judge

7  
8 Submitted by:

9  Bar No. 16406 for

10 AARON D. FORD

Attorney General

11 JEFFREY M. CONNER (Bar No. 11543)

Chief Deputy Solicitor General

12 State of Nevada

Office of the Attorney General

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16 *Attorneys for Defendants*