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REC'D & FILED

2025 AUG 18 PM 4: 28

SCOTT HOEN
CLERK

DEPUTY

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

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

Case No. 25 OC 00109 1B
Dept. No. 1

Plaintiffs,

vs.

THE STATE OF NEVADA, ex rel., JOSEPH LOMBARDO, in his official capacity as Governor of the State of Nevada; ZACH CONINE, in his official capacity as Nevada State Treasurer; RICHARD WHITLEY, in his official capacity as Director of the Nevada Department of Health and Human Services; 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.

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

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

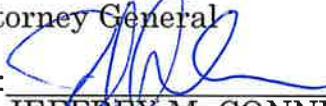
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1 to and including August 25, 2025, in which to file and serve their response to the motion
2 for preliminary injunction.

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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DECLARATION OF COUNSEL

I, JEFFREY M. CONNER, declare under penalty of perjury:

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.

2. I am making this declaration in support of Defendants' motion requesting an
enlargement of time to respond to the motion for preliminary injunction. Plaintiffs served
the motion for preliminary injunction on July 16, 2025, making the original deadline for the
response July 30, 2025, under FJDCR 3.8. This is Defendants' second request for an
extension to respond to the answer.

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.

4. When I spoke with opposing counsel, Christopher M. Jackson and Joshua M. Halen, they indicated they do not oppose the request for an extension of time until August 25, 2025.

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

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

4 By:

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

CERTIFICATE OF SERVICE

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

Joshua M. Halen (ISBN 13885)
HOLLAND & HART LLP
5470 Kietzke Lane, Suite 100
Reno, NV 89511

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

Amanda White
Amanda White

RECD 7/31/2025

2025 JUL 31 AM 7:46

WILLIAM TITUS

William Titus

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

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Services; 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,

20 Defendants.

21 ORDER

22 Defendants have filed an unopposed motion seeking an extension of time to
23 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 31st day of July, 2025

5 
6 District Court Judge

7 Submitted by:

8 
9 Bar No. 16406 for
10 AARON D. FORD
11 Attorney General
12 JEFFREY M. CONNER (Bar No. 11543)
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