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2 JEFFREY M. CONNER (Bar No. 11543)  
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*Attorneys for Defendants*  
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2025 JUL 29 PM 2:14  
FILED  
[Signature]

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 (FIRST**  
24 **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 an enlargement of time, to and  
28 ///

1 including August 18, 2025, in which to file and serve their response to the motion for  
2 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 29th day of July, 2025.

7 AARON D. FORD  
8 Attorney General

9 By:  Bar No. 16406 for  
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  
la, and I make this declaration on behalf of Defendants' motion for enlargement of  
n the above-captioned matter.

A. Plaintiffs served the motion for preliminary injunction on July 16, 2025, making the deadline for the response July 30, 2025, under FJDCR 3.8. This is Defendants' first request for an extension to respond to the answer.

C. Mr. Conner contacted opposing counsel, Christopher M. Jackson and Joshua M. Halen, about this request on July 25, 2025. Mr. Jackson responded, indicating that Plaintiffs do not oppose the request for an extension of time until August 18, 2025.

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3. 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:   
BROOKE GEORGUSON (Bar. No. 16406)  
Deputy Attorney General

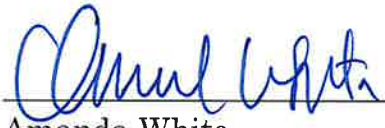
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on this 29th day of July, 2025, I caused to be deposited for mailing a true and correct copy of the foregoing, **DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**, to the following:

Joshua M. Halen (NSBN 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