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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-
11 profit organization, and ROBIN TITUS,
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

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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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DECLARATION OF COUNSEL

I, BROOKE D. GEORGUSON, 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. And I make the
following attestations based on information and belief on behalf of counsel in this case,
Jeffrey M. Conner, because he is currently out of the jurisdiction and unable to sign the
declaration in support of this request as required by FJDCR 3.2(e).

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.

B. Mr. Conner has recently been busy preparing for an important oral argument set before the Nevada Supreme Court on August 6, 2025. Additionally, he is assigned to assist with an important matter that is set on an expedited briefing schedule for an emergency temporary restraining order/preliminary injunction with the opposition and reply respectively due on August 11, 2025, and August 12, 2025. Finally, he is currently out of the jurisdiction on a pre-planned family vacation until August 3, 2025. Given the foregoing, Defendants' request that this Court extend the time to respond to the motion for preliminary injunction to August 18, 2025.

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

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)
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Christopher M. Jackson
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