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WILLIAM BOYD HOEN
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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 Human Services; STACIE
WEEKS, in her official capacity as
19 Director of the Nevada Health Authority;
NED GAINES, in his official capacity as
20 the Acting Nevada Commissioner of
Insurance; and JANEL DAVIS, in her
21 official capacity as Acting Executive
Director of the Silver State Health
22 Insurance Exchange,

23 Defendants.

24 **DEFENDANTS' REQUEST FOR SUBMISSION**

25 Defendants Joseph Lombardo, in his official capacity as Governor of the State of
26 Nevada; Zach Conine, in his official capacity as Treasurer of the State of Nevada; Richard
27 Whitley, in his official capacity as Nevada Department of Human Services; Stacie Weeks,
28 in her official capacity as Director of the Nevada Health Authority; Ned Gaines, in his

1 official capacity as Acting Commissioner of the Division of Insurance; and Janel Davis, in
2 her official capacity as Acting Executive Director of Silver State Health Insurance
3 Exchange (“Exchange”), by and through counsel, submit this request for submission.

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Respondent, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, respectfully requests that the above-referenced matter be submitted to the Court for decision upon Defendants' Reply in Support of Motion to Dismiss filed on September 29, 2025. This request is based upon the provisions of Rule 13(4) of the Rules of Practice of the District Courts of the State of Nevada. Accordingly, the instant matter may be submitted upon the pleadings and other documents on file in this matter.

RESPECTFULLY SUBMITTED this 29th day of September, 2025.

AARON D. FORD
Attorney General

By: Leslie Healer (16710) For:
JEFFREY M. CONNER (Bar. No. 11543)
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 29th day of September, 2025, I served an electronic copy via email of, **DEFENDANTS' REQUEST FOR SUBMISSION**, to the following:

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