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 18 CROSS AND ANTHEM BLUE CROSS  
 19 LIFE AND HEALTH INSURANCE  
 20 COMPANY

21 **UNITED STATES DISTRICT COURT**  
 22 **DISTRICT OF NEVADA**

23 SUNRISE HOSPITAL AND MEDICAL  
 24 CENTER, LLC; SUNRISE  
 25 MOUNTAINVIEW HOSPITAL, INC.; and  
 26 SOUTHERN HILLS MEDICAL CENTER,  
 27 LLC,

28 Plaintiffs,

v.

BLUE CROSS OF CALIFORNIA D/B/A  
 ANTHEM BLUE CROSS; ANTHEM BLUE  
 CROSS LIFE AND HEALTH INSURANCE  
 COMPANY; and KEENAN &  
 ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY

**DEFENDANTS' UNOPPOSED MOTION  
 FOR EXTENSION OF TIME TO MOVE,  
 ANSWER OR OTHERWISE RESPOND  
 TO PLAINTIFFS' FIRST AMENDED  
 COMPLAINT  
 (FIRST REQUEST)**

1 Pursuant to LR IA 6-1 and 6-2, Defendants Blue Cross of California d/b/a Anthem Blue  
2 Cross and Anthem Blue Cross Life and Health Insurance Company respectfully move the Court  
3 for a 21-day extension of time to move, answer or otherwise respond to Plaintiffs' First Amended  
4 Complaint in the above referenced matter from February 8, 2024 until and through February 29,  
5 2024.

6 Plaintiffs' First Amended Complaint adding Defendants to this lawsuit was filed on January  
7 4, 2024. [ECF No. 14]. Defendants were served on January 18, 2024; therefore, Defendants'  
8 deadline to move, answer or otherwise respond to Plaintiffs' First Amended Complaint is February  
9 8, 2024. As such, this request for extension is being made before the expiration of the specified  
10 period pursuant to the local rules.

11 This extension is being requested because additional time is needed to fully evaluate the  
12 allegations in the First Amended Complaint and to formulate a response.

13 Therefore, Defendants request a 21-day extension from February 8, 2024 through and until  
14 February 29, 2024 to answer, move or otherwise respond to Plaintiff's First Amended Complaint.

15 This is Defendants' first request for an extension of time in this matter.

16 This Motion is not for delay, but so that justice may be done. The extension of time will in  
17 no way prejudice any party, as there is no scheduling order or other deadlines set in this case to  
18 date.

19 Counsel for Plaintiffs has advised that Plaintiffs are not opposed to the relief sought by way  
20 of this Motion.

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