

1 SUE FAHAM
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar No. 5634

5 KARISSA D. NEFF
6 Assistant United States Attorney
7 Nevada Bar No. 9133
8 501 Las Vegas Blvd. So., Suite 1100
9 Las Vegas, Nevada 89101
10 Phone: (702) 388-6336
11 Karissa.Neff@usdoj.gov

12 *Attorneys for the United States*

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14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

15 Alyssia Nungaray, a minor, by and through
16 her parents, Fernanda Jiminez and Adan
17 Nungaray,

18 Plaintiffs,

19 v.

20 Pokroy Medical Group of Nevada, LTD., *et*
21 *al.*,

22 Defendants.

23 Case No. 2:25-cv-00014-JAD-MDC

24 **Stipulation to Extend United States'**
Deadline to File Response to Plaintiff's
Complaint

25 **(First Request)**

26 Plaintiffs, Fernanda Jiminez and Adan Nungaray, through counsel and the United
27 States of America, on behalf of Federal Defendants, through undersigned counsel, hereby
28 agree and stipulate to extend the deadline to file a responsive pleading to Plaintiff's
Complaint from March 17, 2025 to April 2, 2025. The parties enter into this stipulation
based on the following:

- 29 1. Plaintiff filed the Complaint on January 3, 2025 (ECF No. 1).
- 30 2. Plaintiff served the United States with a copy of the Summons and
31 Complaint on January 16, 2025.
- 32 3. The current deadline for the United States to respond to the Plaintiff's
33 Complaint is March 17, 2025.

1 Plaintiff and the United States, through undersigned counsel, agree and stipulate
2 that the United States' time to respond to the Plaintiff's Complaint shall be extended
3 through April 2, 2025. This is the first request for an extension of time.

4 The extension of time is necessary for the United States' counsel to obtain and
5 review the relevant information regarding the allegations in Plaintiff's complaint and to
6 accommodate United States' counsel's workload in other cases.

7 Therefore, the parties request that the Court extend the deadline for the United
8 States to file a responsive pleading to Plaintiff's Complaint through April 2, 2025.

9 This stipulated request is filed in good faith and not for the purpose of undue delay.

10 Respectfully submitted this 11th day of March 2025.

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12 BREEDEN & ASSOCIATES, PLLC

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14 /s/ Adam J. Breeden
15 ADAM J. BREEDEN, ESQ.
Nevada Bar No. 008768
7432 W. Sahara Ave., Suite 101
Las Vegas, Nevada 89117

16
17 Attorney for Plaintiff

SUE FAHAM
Acting United States Attorney

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney

Attorneys for the United States

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19 IT IS SO ORDERED:
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22 UNITED STATES MAGISTRATE JUDGE
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DATED: 3-12-25