

1 SUE FAHAMI  
Acting United States Attorney  
2 District of Nevada  
Nevada Bar No. 5634

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

7 *Attorneys for the United States*

8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 Alyssia Nungaray, a minor, by and through  
11 her parents, Fernanda Jiminez and Adan  
Nungaray,

12 Plaintiffs,

13 v.

14 Pokroy Medical Group of Nevada, LTD., *et*  
15 *al.*,

16 Defendants.

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

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

**(First Request)**

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

- 23 1. Plaintiff filed the Complaint on January 3, 2025 (ECF No. 1).  
24 2. Plaintiff served the United States with a copy of the Summons and  
25 Complaint on January 16, 2025.  
26 3. The current deadline for the United States to respond to the Plaintiff's  
27 Complaint is March 17, 2025.  
28

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.

11  
12 BREEDEN & ASSOCIATES, PLLC

SUE FAHAMI  
Acting United States Attorney

13  
14 /s/ Adam J. Breeden  
ADAM J. BREEDEN, ESQ.  
Nevada Bar No. 008768  
15 7432 W. Sahara Ave., Suite 101  
Las Vegas, Nevada 89117

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

*Attorneys for the United States*

16  
17 *Attorney for Plaintiff*

18  
19 **IT IS SO ORDERED:**

20  
21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** 3-12-25  
23  
24  
25  
26  
27  
28