

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

Health Republic Insurance Company,

Plaintiff, on behalf of  
itself and all others  
similarly situated,

vs.

United States of America.

Defendant.

Case No. 16-259C

Judge Kathryn C. Davis

**PLAINTIFF’S UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME TO  
RESPOND TO DEFENDANT’S COUNTERCLAIM**

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims, Plaintiff Health Republic Insurance Company (“Health Republic”) respectfully requests an enlargement of time to respond to Defendant United States’ Counterclaims (Dkt. 101). Plaintiff’s Answer to Defendant’s Counterclaim is currently due on September 2, 2022 (Dkt. 170). If Plaintiff’s motion is granted, its Answer would be due October 3, 2022. Plaintiff has not previously sought any extension of time on this Answer.

Defendant United States does not oppose this request for an enlargement of time. This request for additional time is necessary to allow Plaintiff to review and analyze the arguments raised in Defendant’s Counterclaim. The requested extension will not prejudice the parties or result in undue delay.

For these reasons, Plaintiff respectfully requests that the Court grant this motion for an enlargement of time to answer Defendant’s Counterclaim until October 3, 2022.

Dated: August 30, 2022

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

*/s/ Stephen A. Swedlow*

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