

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 October 3, 2022 (Dkt. 170). If Plaintiff’s motion is granted, its Answer would be due two weeks following the Court’s ruling on Plaintiff’s forthcoming Motion for Clarification of the Court’s August 19, 2022 Opinion and Order (Dkt. 170). Plaintiff intends to file the Motion for Clarification as soon as possible the week of October 3, 2022. The Court’s ruling on the Motion for Clarification will impact the parties’ ongoing discussions and Plaintiff’s response to Defendant’s Counterclaims. Plaintiff has previously sought and was granted a 31-day extension on its Answer to Defendant’s Counterclaim. (Dkt. Nos. 170-171.)

Defendant United States has been informed of Plaintiff’s intention to file the Motion for Clarification and does not oppose this request for an enlargement of time. 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 two weeks following the Court's ruling on the forthcoming Motion for Clarification.

Dated: September 30, 2022

Respectfully submitted,

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