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10 *Attorneys for the United States*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 Ray L. Flores II,

14 Plaintiff,

15 v.

16 Robert F. Kennedy, Jr., as Secretary of the  
17 Department of Health and Human Services,

18 Defendant.

19 Case No. 2:25-cv-00916-JAD-NJK

20 **Stipulation to Extend Time for United  
21 States to Respond to Plaintiff's  
22 Complaint (First Request)**

23 Pursuant to Local Rule IA 6-1, Defendant Robert F. Kennedy, Jr., in his official  
24 capacity as Secretary of the Department of Health and Human Services ("Secretary" or  
25 "Defendant") requests a 14-day extension to file its answer or otherwise respond to  
26 Plaintiff's Complaint (ECF No. 1).

27 This matter is a declaratory relief action alleging violations of the National  
28 Childhood Vaccine Injury Act of 1986. Defendant was served with the Summons and  
Complaint on June 2, 2025. Under Fed. R. Civ. P 12(a)(2), Defendant must answer or  
otherwise respond to Plaintiff's Complaint by August 1, 2025.

Defendant respectfully requests additional time to respond to the Complaint in  
order to allow the parties an opportunity to explore the potential for early resolution of this  
matter before engaging in further litigation. Counsel for Defendant has conferred with  
Plaintiff, and the parties have agreed to a fourteen (14) day extension of Defendant's

1 deadline to answer or otherwise respond to the Complaint, through and including August  
2 15, 2025.

3 Accordingly, Defendant respectfully requests the Court grant this stipulation and  
4 extend the time for Defendant to answer or otherwise respond by 14 days, or by **August 15,**  
5 **2025.**

6 | Respectfully submitted this 25th day of July 2025.

Dated this 24 day of July 2025.

~~Ray L. Flores II,  
Plaintiff in Pro Per~~

Dated this 25th day of July 2025.

SIGAL CHATTAH  
United States Attorney

/s/ Summer A. Johnson  
SUMMER A. JOHNSON  
Assistant United States Attorney  
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*Attorney for Defendant*

## IT IS SO ORDERED:

~~UNITED STATES DISTRICT JUDGE  
UNITED STATES MAGISTRATE JUDGE~~

**DATED:** July 28, 2025