

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

NANCY G. ATKINS, in her capacity	:	
as Liquidator of Kentucky Health	:	Case No. 17-1108C
Cooperative, Inc.,	:	
	:	Judge Horn
Plaintiff,	:	
	:	
v.	:	
	:	
THE UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	

**UNITED STATES' AMENDED, UNOPPOSED MOTION FOR AN EXTENSION OF
TIME TO RESPOND TO THE COMPLAINT AND TO CONTINUE STATUS
CONFERENCE**

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, the United States respectfully requests a 45-day extension of time, up to and including January 29, 2018, within which to respond to the Complaint of Nancy G. Atkins, in her capacity as liquidator of Kentucky Health Cooperative, Inc. (the "Liquidator"). The United States has already received two 30-day extensions, and its response is currently due December 15, 2017. The Court also has scheduled a status conference for December 19, 2017. On December 15, the United States requested a 45-day extension, but could not report to the Court the Liquidator's position. After conferring with counsel for the Liquidator on the morning of December 18, the United States can now report that the Liquidator consents to the requested extension and the continuance of the status conference.

As was stated in the United States' prior motions for an extension, the parties are working to resolve the claims raised in the complaint. But to do so, the parties need additional time to continue their discussions due to the significant amount and basis for the claims at issue. The

United States also requests that the Court continue the status conference scheduled for December 19, 2017 until a date after the United States responds to the complaint, as the parties still believe that they will likely resolve this dispute in the interim.

For these reasons, the United States respectfully requests an extension of 45 days, up to and including January 29, 2018, to file a response to the complaint, and that the status conference be continued until after the United States responds to the complaint.

Dated: December 18, 2017

Respectfully submitted,

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Acting Assistant Attorney General

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Director
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/s/ Charles E. Canter

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December 2017, a copy of the foregoing, *United States' Amended, Unopposed Motion for an Extension of Time to Respond to the Complaint and to Continue Status Conference*, was filed electronically with the Court's Electronic Case Filing (ECF) system. I understand that notice of this filing will be sent to all parties by operation of the Court's ECF system.

/s/ Charles E. Canter
Charles E. Canter
United States Department of Justice