

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:20-cv-213
)	
UNIVERSITY OF VERMONT)	
MEDICAL CENTER,)	
)	
Defendant.)	

**JOINT MOTION TO FURTHER ENLARGE TIME
TO RESPOND TO COMPLAINT**

The United States (“Government”) and the University of Vermont Medical Center (“UVMMC”) hereby jointly move to further enlarge the time in which UVMMC may respond to the complaint in this matter to Friday, September 17, 2021.

UVMMC, with the Government’s assent, previously requested three enlargements of time to respond to the complaint. The Court granted those motions on December 28, 2020, February 8, 2021; and April 8, 2021. The Court’s April 8th Order also stayed all discovery pending further order of the Court.

Good cause exists for the parties’ request to enlarge time by approximately two more months because the extension would give new and still-incoming leadership at the Department of Justice and Department of Health and Human Services more time to continue to reassess the issues that this case presents, and to determine the appropriate course for the Government to take going forward, before the parties expend significant time and resources litigating a motion to dismiss the complaint. The requested further enlargement of time also will allow UVMMC to focus its resources on patient care during that period.

Both parties have stipulated to this motion and with the Government's consent UVMMC has e-signed on behalf of Acting United States Attorney Jonathan Ophardt.

Wherefore, the parties respectfully jointly request the further enlargement of time described above, and include herewith a proposed order for the Court's convenience.

Dated at Burlington, Vermont this 30th day of June, 2021.

UNITED STATES OF AMERICA

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ORDER

This matter comes before the Court on the parties' Joint Motion to Further Enlarge Time to Respond to Complaint. For the reasons stated in the Motion, the parties' joint Motion is GRANTED. UVMMC shall have until September 17, 2021 to respond to the Complaint.

SO ORDERED.

Dated at Burlington, Vermont, this ____ day of June 2021.

Honorable William K. Sessions III
United States District Judge