

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

CLOVER INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:25-cv-142
)	
U.S. DEPARTMENT OF HEALTH AND)	
HUMAN SERVICES, ET AL.,)	
)	
Defendants.)	

MOTION FOR BRIEFING SCHEDULE

On February 2, 2026, while Defendant’s potentially dispositive motion to dismiss was still pending, Plaintiff filed a premature motion for summary judgment. Doc. 34. Out of an abundance of caution, Defendants asked this Court to relieve them of the duty to respond to Plaintiff’s premature motion while their motion to dismiss remained pending. Doc. 37. Prior to ruling on Defendant’s motion, however, the Court denied Defendant’s motion to dismiss. Doc. 40. The Court has not yet ruled on the motion for relief.

Recognizing that Plaintiff’s motion for summary judgment is no longer premature, Defendants therefore propose the following briefing schedule for responding to Plaintiff’s motion for summary judgment and for filing their own cross motion for summary judgment.

April 17, 2026	Deadline for Defendant to respond to Plaintiff’s Motion for Summary Judgment and file their own Cross Motion for Summary Judgment
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May 8, 2026	Deadline for Plaintiff to file any reply in support of Plaintiff's Motion for Summary Judgment and respond to Defendant's Cross Motion for Summary Judgment.
May 22, 2026	Deadline for Defendant to file any reply in support of Defendant's Cross Motion for Summary Judgment.

Prior to filing this Motion, undersigned counsel conferred with counsel for Plaintiff during a conference call and sought consent for this briefing schedule. Plaintiff's counsel did not consent to this briefing schedule. (Plaintiff's counsel did ask Defendants to modify their request to allow three weeks between the initial deadline and the second deadline, to which undersigned counsel agreed.)

A proposed order is attached.

Respectfully submitted,

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