UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

SHANDS JACKSONVILLE MEDICAL CENTER, INC., et al.,)))
Plaintiffs,))) Case No. 1:14-cv-00263
v.)
SYLVIA MATHEWS BURWELL,)
Defendant.)
)

PLAINTIFFS' MOTION FOR LEAVE TO FILE TWO REPLY BRIEFS

The American Hospital Association, Athens Regional Medical Center, and Bakersfield Heart Hospital plaintiffs respectfully seek this Court's leave to submit two reply briefs in these consolidated cases. As this Court recognized might happen (*see* Tr. Oral Arg. 58:11-15), the plaintiff hospitals were unable to reach agreement on a single consolidated reply brief. The AHA, Athens Regional, and Bakersfield plaintiffs believe it is appropriate to seek leave to file two reply briefs, given the parties' unitary initial submission. These plaintiffs' short proposed reply brief is attached as Exhibit A. The government takes no position on the motion for leave, but reserves the right to seek leave to file a surreply.

Dated: August 31, 2015

s/ Catherine E. Stetson

Catherine E. Stetson (DC Bar. No. 453221) Sheree R. Kanner (DC Bar No. 366926) Margia K. Corner (DC Bar No. 1005246)

HOGAN LOVELLS US LLP 555 Thirteenth Street, NW Washington, DC 20004 Phone: (202) 637-5600 Facsimile: (202) 637-5910

cate.stetson@hoganlovells.com

Counsel for American Hospital Association Plaintiffs

Respectfully submitted,

s/ Mark D. Polston

Mark D Polston (DC Bar No. 431233) Daniel J. Hettich (DC Bar No. 975262) Ethan P. Davis (DC Bar. No. 1019160)

KING & SPALDING LLP 1700 Pennsylvania Avenue, NW

Washington, DC 20006 Telephone: (202) 737-0500 Facsimile: 202.626.3737 dhettich@kslaw.com

Counsel for Plaintiffs Athens Regional et al.

s/ Lori A. Rubin

Lori A. Rubin, DC Bar No. 1004240 Benjamin R. Dryden, DC Bar No. 983757 Foley & Lardner LLP 3000 K Street, NW, Suite 600 Washington, DC 20007-5143 Telephone: (202) 672-5300

Fax: (202) 672-5399 Email: larubin@foley.com Email: bdryden@foley.com

Counsel for Plaintiffs Bakersfield Heart Hospital et al.