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

13 CITY OF NORTH LAS VEGAS,)

14 Plaintiff,)

15 v.)

16 CLARK COUNTY, NEVADA; THE UNITED)
17 STATES OF AMERICA, Acting By and)
18 Through the Secretary of the Air Force;)
19 UNITED STATES DEPARTMENT OF THE)
20 AIR FORCE; and MICHAEL B. DONLEY,)
21 Secretary of the Air Force,)

22 Defendants.)

Case No: 2:11-cv-00944-PMP-PAL

23 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
24 (First Request)

25 Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 6-1, Defendants, the United States
26 of America, the United States Department of the Air Force, and Michael B. Donley, Secretary
of the Air Force (hereinafter collectively referred to as the “United States”) request that this
Court extend the deadline for the United States to “file a responsive memorandum regarding
this Court’s jurisdiction. . .” from July 5, 2011 to July 12, 2011. The primary reason for this

1 request is that counsel for the United States has not been able to review and digest the several
2 thousand pages of pleadings and papers filed in this case, coordinate with the United States Air
3 Force, or complete research on the many jurisdictional issues raised by the parties. This
4 motion is based upon the attached Memorandum of Points and Authorities.

5 Respectfully submitted this 30th day of June 2011.

6 DANIEL G. BOGDEN
7 United States Attorney

8 */s/ Blaine T. Welsh*
9 BLAINE T. WELSH
 Assistant United States Attorney

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1 (A) with or without motion or notice if the court acts, or if a request is
2 made, before the original time or its extension expires; . . .

3 For the following reason, good cause exists to extend the July 5, 2011 deadline until
4 July 12, 2011. The United States has acted diligently to meet the existing deadline. From the
5 time the United States learned of the June 22, 2011 Minute Order until the present, counsel for
6 the United States has made a concerted effort to gather information about this case and prepare
7 the required response. Counsel has downloaded several hundred pages of pleadings, motions
8 and papers filed in this case and has reviewed some, but not all of them. In addition,
9 undersigned counsel has communicated with counsel for the United States Air Force
10 (“USAF”) about this case and the facts underlying it. Counsel for the USAF have provided
11 some background material and are working to provide additional information. In addition,
12 counsel has undertaken research on the numerous jurisdictional issues the United States is to
13 address. Despite these efforts, significant work still needs to be done before the United States
14 can adequately respond to the jurisdictional issues the other parties have raised.

15 In addition to work on this case, undersigned counsel has had to meet deadlines in a
16 number of other cases assigned to him and has had to attend to myriad administrative duties as
17 Civil Division Chief.

18 Further while it is a pleasure to celebrate Independence Day, that celebration takes
19 away at least one day of the already short response period.

20 The United States respectfully submits that these reasons demonstrate good cause and
21 amply support its request that the July 5, 2011 deadline to respond be extended to July 12,
22 2011.

23 **III Consultation with Opposing Counsel**

24 Counsel for the City of North Las Vegas do not oppose the requested extension.
25 Similarly, counsel for Clark County, Nevada do not oppose the requested extension but asked
26 that counsel for the government indicate in this unopposed motion that Clark County does not

1 want this extension to impact the briefing on the motion to remand pending in the related case
2 captioned, *Clark County v. City of North Las Vegas*, 2:11-cv-01012-PMP-PAL.

3 **IV Conclusion**

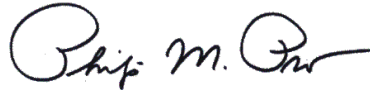
4 The United States certifies that this motion is not submitted solely for the purpose of
5 delay or for any other improper purpose. Rather, despite diligent efforts to meet the current
6 deadline, the United States needs additional time to prepare the required responsive brief. For
7 the foregoing reasons, the current July 5, 2011 deadline should be extended to July 12, 2011.

8 Respectfully submitted this 30th day of June 2011.

9 DANIEL G. BOGDEN
10 United States Attorney

11 */s/ Blaine Welsh*
12 BLAINE T. WELSH
13 Assistant United States Attorney

14
15 IT IS SO ORDERED:

16 

17 _____
18 UNITED STATES DISTRICT JUDGE/

19 DATED: July 1, 2011. _____

1 **PROOF OF SERVICE**

2 I, Blaine T. Welsh, AUSA, certify that the following individual was served with the
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME** on this date by the below identified
4 method of service:

5 **Electronic Case Filing**

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DATED this 30th day of June 2011.

/s/ Blaine Welsh
BLAINE T. WELSH
Assistant United States Attorney