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5 **UNITED STATES DISTRICT COURT**
 6 **DISTRICT OF ARIZONA**

7 MARIA P. PADILLA,
 8 Plaintiff,

9 v.

10 STATE OF ARIZONA, dba
 11 Arizona Department of Corrections;
 12 Antonio Villa and "Jane Doe Villa,
 13 Husband & Wife,
 14 Defendants.

CV 06-3007 PHX JAT
 MOTION TO ENLARGEMENT
 OF TIME TO COMPLETE
 DISCOVERY AND RELATED
 DEADLINES

15 Counsel for plaintiff, Maria P. Padilla, hereby seeks on her behalf an
 16 enlargement of time to complete discovery and related deadlines. The current
 17 discovery deadline is January 18, 2008. Sixty (60) additional days are requested.
 18 This additional time is needed due to the mental status of plaintiff, who is on an
 19 extended medical leave from work and under the active care of a psychologist,
 20 James Parker, at Yuma Bio-Behavioral Clinical Psychology, PLLC.

21 Dr. Parker has confirmed that Ms. Padilla is under his care and has not
 22 been able to work since July 10, 2007. She currently suffers from panic disorder,
 23 major depression, moderate and poor concentration to the degree that she
 24 cannot work. Medications have been prescribed and are part of the treatment
 25 plan.

26 Ms. Padilla's condition is related to the work environment and the
 27 consistent pattern of hostility she has been confronted with since reporting her
 28 Sargent, Villa, for sexual harassment. For example on June 12, 2007 Ms. Padilla

1 was served with an official departmental notice that she was terminated. This
2 action was then rescinded and upon returning to work on June 15th she was
3 shortly thereafter confronted with new allegations of misconduct on July 9, 2007.

4 Ms. Padilla's deposition was scheduled for September 10, 2007. This date
5 was agreed to by counsel. Since then Dr. Parker has advised counsel that Ms.
6 Padilla would not be able to attend a deposition before the middle of October.
7 Counsel is starting a trial on October 16, 2007 in *Alvarado v. Cajun Operating*
8 *Company*, CV 04-631 TUC CKJ. This jury trial is expected to last up to two
9 weeks. Thus counsel and Ms. Padilla would not be available until the week of
10 November 5th for her deposition.

11 This request is in compliance with the applicable Federal Rules of Civil
12 Procedure and the Local Rules for the District of Arizona. Good cause exist for
13 granting the short extension requested.

14 Respectfully submitted this 15th day of August, 2007.

15 s/Richard M. Martinez, Esq.
16 RICHARD M. MARTINEZ, ESQ.
Counsel for Plaintiff

17 I certify that I electronically transmitted
18 the attached document to the Clerk's Office
19 using the CM/ECF system for filing and
20 transmittal of a Notice of Electronic Filing to the
following, if CM/ECF registrants, and mailed a
copy of same to any non-registrants, this 15th
day of August, 2007:

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s/Richard M. Martinez, Esq.