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14 Attorneys for Plaintiff,
DONNA CORBELLO

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 DONNA CORBELLO, an individual,

19 Plaintiff,

20 vs.

21 THOMAS GAETANO DEVITO, an
individual, *et al.*,

22 Defendants.
23

Case No. 2:08-cv-00867-RCJ-PAL

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT
BRICKMAN'S MOTION TO COMPEL
(Doc. 396)**

(Sixth Request)

24 Plaintiff, Donna Corbello, by her attorneys, and pursuant to LR 6-1 and 7-2, hereby
25 moves for a further extension of time, through Monday, March 14, 2011, in which to respond to
26 the *Motion by Defendant Marshall Brickman to Compel Further Responses by Plaintiff to*
27 *Interrogatories*, (Doc 396). Whereas Plaintiff's response is currently due today (March 11,
28

1 2011), the requested extension is for one business day. This is Plaintiff's sixth request for an
2 extension of time.

3 Plaintiff submits that good cause exists for the grant of the requested extension. As
4 explained in the parties' preceding *Stipulation* (Doc. 438), Plaintiff's lead counsel had
5 obligations in another matter earlier this week, and, beginning yesterday afternoon and
6 continuing through today, counsel has had to deal with an unexpected emergency on behalf of an
7 existing client in New Orleans, involving a trademark infringement matter for which a complaint
8 and application for a temporary restraining order must be filed in the Eastern District of
9 Louisiana. Counsel has now secured a local counsel to assist in that matter, so he can continue to
10 focus on the extant issues in this case. However, as a result of this unscheduled obligation,
11 Plaintiff's counsel has been unable to complete Plaintiff's response to (Doc. 396.) Accordingly,
12 the additional time requested is necessary.

13 This request is not made for any improper purpose or delay, and Defendant will not be
14 prejudiced thereby, as the parties have requested that the hearing previously scheduled for March
15 22, 2011 on *Defendant's Motion* be taken off the calendar, pending a forthcoming stipulation to
16 reset the hearing date.

17 IN VIEW OF THE ABOVE, Plaintiff respectfully requests that her present *Motion* be
18 granted, and that she be accorded through Monday, March 14, 2011 to file her response to
19 *Defendant's Motion*.

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Dated: March 11, 2011

RESPECTFULLY SUBMITTED:

By: /s/Gregory H. Guillot
Gregory H. Guillot
George L. Paul
John L. Kreiger (Nevada Bar No. 6023)
Robert H. McKirgan

Attorneys for Plaintiff, Donna Corbello

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE
DATED March 14, 2011

CERTIFICATE OF SERVICE

I, Gregory H. Guillot, do hereby certify that a true and correct copy of the foregoing document was served, by CM/ECF, on this, the 11th day of March 2011, upon each of the following:

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