Eduardo Libres 7224 Gentle Valley Street Las Vegas, NV 89149 (702) 245-7138



UNITED STATES DISTRICT COURT

For the

DISTRICT OF NEVADA (LAS VEGAS)

EDUARDO D. LIBRES, an individual,

Plaintiff,

٧.

BANK OF AMERICA, a Business unknown.; Entity. form COUNTRYWIDE HOME LOANS, INC., a Business Entity, form unknown; LR FINANCIAL, LLC /DBA/ SOUTHERN **NEVADA MORTGAGE**, a Business Entity, form unknown; LAWYERS TITLE OF NEVADA, INC, a Business Entity, form unknown; MORTAGE REGISTRATION ELECTRONIC SYSTEMS, INC., a Business Entity, form unknown; and DOES 1-100 inclusive.

Defendants,

CIVIL NO. 2:1/0/00/15

MOTION TO REQUEST ENLARGEMNET
OF TIME FOR FILING SHOW A GOOD
CAUSE OF WHY THIS CASE SHOULD
NOT BE DISMISS UNDER THE RULE 6(B)
AND TO ALLOW PLAINTIFF A
DISCOVERY PURSUANT TO RULE 26

MOTION TO REQUEST ENLARGEMENT OF TIME FOR FILING SHOW A GOOD CAUSE OF WHY THIS CASE SHOULD NOT BE DISMISS UNDER THE RULE 6(B)
AND TO ALLOW PLAINTIFF A DISCOVERY PURSUANT TO RULE 26

Plaintiffs' respectfully move this case to enlargement of time for filing a good cause on why this case should not be dismiss and to allow Plaintiff a discovery for the reasons set forth below;

- 1. Plaintiff do not have access to a large staff to handle like an ordinary business, let alone the extra-ordinary demands of litigation. Plaintiff is a PRO SE litigant and have been preparing the documents slowly and have been carefully assigned to assure Plaintiff's orderly and timely involvement with this case and answer to be going to file will be carefully fit and valid.
- 2. Federal Defendant' conducts has forced Plaintiff to represent his imminently threatened agency action. Plaintiffs felt stressed and cannot concentrate and deprived his ability to prepare and file any documents to be answer within the time normally allotted for the same as a lawyer.
- 3. Plaintiffs' believe an extension of time to show a good cause of why this case should not be dismiss would be sufficient for filing an extension of time to August 11, 2011.

WHEREFORE, Plaintiffs move this Court for an Order extending the time for filing show good cause of why this case should not be dismiss and to allow discovery against the defendants' and Enlargement of time to August 11, 2011 pursuant to FCRP 16(b).

Dated: JULY 13, 2011

Eduardo Libres PRO SE PLAINTIFF

CERTIFCATE OF SERVICE

I HEREBY CERTIFY THAT ON THIS DATE, A TRUE AND CORRECT COPIES OF THE FOREGOING DOCUMENT WAS SERVED ON THE FOLLOWING BY U.S. CERTIFIED MAIL TO DEFENDANT'S ATTORNEYS NOTED BELOW;

Defendant Attorneys:

Zachary T. Ball, Esq. Nevada Bar No. 8364 3980 Howard Hughes Parkway, Suite 230 Las Vegas, NV 89169 Attorneys for Defendant *Lawyers Title of Nevada, Inc.*

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IT IS ORDERED that plaintiff's motion (#23) is denied without prejudice.

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Lawrence R. Leavitt U.S. Magistrate Judge

Eduardo D. Libres, Plaintiff Pro Se