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 7 of Nevada ex rel. Board of Regents of  
 the Nevada System of Higher Education,  
 8 on behalf of the University of Nevada,  
 Las Vegas and Vernon Hodge*  
 9

10 **IN THE UNITED STATES DISTRICT COURT**  
 11 **FOR THE DISTRICT OF NEVADA**

13 SUJANIE V.S.V. GAMAGE aka SUJANIE  
 14 GAMAGE SAMARASEK,

CASE NO.: 2:12-cv-00290-GMN-VCF

15 Plaintiff,

16 vs.

17 THE STATE OF NEVADA ex rel. BOARD  
 OF REGENTS OF THE NEVADA  
 SYSTEM OF HIGHER EDUCATION, on  
 18 behalf of THE UNIVERSITY OF  
 NEVADA, LAS VEGAS; a Political  
 19 Subdivision of the State of Nevada;  
 VERNON HODGE, individually and in his  
 20 official capacity as an employee of the  
 University of Nevada, Las Vegas; and DOES  
 21 I-XX inclusive,

**MOTION FOR ENLARGMENT OF  
 TIME TO FILE RESPONSIVE  
 PLEADING TO PLAINTIFF'S  
 COMPLAINT  
 [SECOND REQUEST]**

22 Defendants.

24 Defendants, The State of Nevada ex rel., its Board of Regents of the Nevada System of  
 25 Higher Education, on behalf of the University of Nevada, Las Vegas ("UNLV") and Vernon  
 26 Hodge, individually and in his official capacity ("Hodge" and collectively "Defendants") by and  
 27 through counsel, Elda M. Sidhu, General Counsel, University of Nevada, Las Vegas, and J.  
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1 Marty Howard, Assistant General Counsel, University of Nevada, Las Vegas, hereby move this  
2 Court for an extension of time in which to file a responsive pleading to Plaintiff's Complaint, that  
3 will extend the present deadline date of April 9, 2012 to **April 23, 2012**. This motion is brought  
4 pursuant to Fed. R. Civ. P. 6(b), LR 6-1 and LR 6-2, the attached points and authorities, and the  
5 papers and pleadings on file with the Court.

6 DATED this 6th day of April, 2012.

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the Nevada System of Higher Education,  
on behalf of the University of Nevada,  
Las Vegas and Vernon Hodge*

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17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 I began working for UNLV on or about January 9, 2012 and am becoming familiar with a  
19 new area of the law and client.

20 I had scheduled a meeting with Defendant Hodge and another representative on April 5,  
21 2012 to discuss the process in a student academic misconduct case, go through and have the  
22 client explain the documents to me; and review the complaint and formulate an answer.

23 I was informed on or about April 4, 2012 the meeting needed to be rescheduled due to the  
24 fact it is spring break.

25 I have rescheduled the meeting for April 9, 2012.

26 This Honorable Court graciously granted the parties previous Stipulation to Extend Time  
27 to Answer Complaint (First Request) on March 7, 2012. (CR#8). Therefore, an answer is  
28 currently due on April 9, 2012.

1 Defendants would respectfully request an additional 10 business days to file an answer to  
2 the complaint in this matter to and including, April 23, 2012.

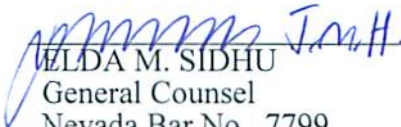
3 Federal Rule of Civil Procedure 6(b)(1) provides “[w]hen an act may or must be done  
4 within a specified time, the court may, for good cause, extend the time: (A) with or without  
5 motion or notice if the court acts, or if a request is made, before the original time or its extension  
6 expires.” Fed. R. Civ. P. 6(b)(1)(A).

7 Judges have wide discretion in managing their dockets. See *Hernandez v. City of El*  
8 *Monte*, 138 F.3d 393, 399 (9<sup>th</sup> Cir. 1998). Also, Fed R. Civ. P. 6(b) (advisory committee note,  
9 1946) (“Rule 6(b) is rule of general application giving wide discretion to the court to enlarge  
10 these time limits or revive them after they have expired...”).

11 **CONCLUSION**

12 Based on the above, University respectfully requests the Court grant an extension of 10  
13 business days from the stipulated date University’s response to Plaintiff’s Complaint is currently  
14 due, April 9, 2012, until April 23, 2012, to file its Answer to Plaintiff’s Complaint.

15 DATED: April 6<sup>th</sup>, 2012.

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*Attorneys for Defendants*

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24 IT IS SO ORDERED: April 6, 2012

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United States District Court Judge

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**CERTIFICATE OF SERVICE**

I certify that on this date, April 6, 2012, I served the following *MOTION FOR ENLARGMENT OF TIME TO FILE RESPONSE PLEADING TO PLAINTIFF'S COMPLAINT [SECOND REQUEST]* via electronic service on the date and to the address(es) shown below:

Jason J. Bach, Esq.  
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ANGELA CHRISTIAN, an employee  
of the University of Nevada, Las Vegas