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2	District of Nevada		
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10 11	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA SHANNEN BRADLEY, individually and as)		
12	Personal Representative of the Estate of) RICHARD WILLIAMS, deceased, SEAN) Case No. 2:12-cv-01526-APG-GWF WILLIAMS and PATRICK WILLIAMS,)		
14	Plaintiffs,		
15	V.)		
16	UNITED STATES OF AMERICA,		
17) Defendant.		
18))		
19	UNOPPOSED MOTION FOR EXTENSION OF TIME OF DISCOVERY DEADLINES (Fourth Request)		
20			
21	The United States of America ("United States") respectfully requests an extension of time of		
22	thirty (30) days for all remaining discovery deadlines in order to allow the parties to complete		
23	settlement discussions that have been ongoing.		
24	In support of the instant Motion, the United States submits the following:		
25	1. This Motion is brought in order to accommodate the undersigned counsel for the United		
26	States.		

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1	2.	On January 29, 2014, the current Scheduling Order was granted by the Court (ECF	
2	#43) setting revised discovery deadlines. Since that time, the parties have been discussing a possible		
3	settlement in this case. Although discussions are continuing, they will not conclude before some of		
4	the discovery deadlines must be met. Specifically, over the course of the parties' settlement		
5	discussions a new issue has arisen that is quite complex and will require additional time to evaluate,		
6	resolve, and determine its application to the settlement value of this case.		
7	3.	Undersigned counsel and Plaintiff's counsel have agreed a thirty (30) day extension of	
8	time is needed, and that postponing the remaining discovery deadlines during this period of time is in		
9	the best interest of both parties.		
10	4.	The following deadlines would apply:	
11		a. Discovery ends July 30, 2014.	
12		b. Expert disclosures due June 2, 2014 .	
13		c. Rebuttal experts due July 2, 2014.	
14		d. Dispositive motions due August 29, 2014.	
15		e. Joint Pretrial Order due October 1, 2014 .	
16	5.	The instant motion is filed in good faith and not for the purposes of delay.	
17	WHEREFORE, for the above reasons, the United States respectfully requests the instant		
18	Motion extending time of all discovery deadlines for thirty (30) days be granted.		
19	Respe	ectfully submitted this 10th day of April 2014.	
20		DANIEL G. BOGDEN United States Attorney	
21		/s/ Justin E. Pingel	
22		JUSTIN E. PINGEL Assistant United States Attorney	
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24		IT IS SO ORDERED:	
25		GEORGE FOLEY, JR.	
26		United States Magistrate Judge DATED: April 11, 2014	
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