

1 ADAM PAUL LAXALT  
 Attorney General  
 2 MATTHEW S. JOHNSON (Bar No. 12412)  
 Deputy Attorney General  
 3 State of Nevada  
 Office of the Attorney General  
 4 100 North Carson Street  
 Carson City, Nevada 89701-4717  
 5 Telephone: (775) 684-1272  
 Fax: (775) 684-1108  
 6 MJohnson@ag.nv.gov  
 Attorney for Respondents  
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8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 IVAN DOMINGUEZ,  
 11 Petitioner(s),

Case No. 2:12-cv-01609 -APG-NJK

12 vs.

**UNOPPOSED MOTION FOR  
 ENLARGEMENT OF TIME**

13 BRIAN E. WILLIAMS,  
 14 Respondent(s).

**ORDER**

15 Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of  
 16 Nevada, hereby respectfully move this Court for an order granting a sixty (60) day enlargement of time  
 17 in which to file and serve their response to Ivan Dominguez’s (Dominguez) first amended petition for a  
 18 writ of habeas corpus.

19 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure  
 20 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and  
 21 other materials on file herein.

22 There have been no prior enlargements of Respondents’ time to file said response to the first  
 23 amended petition, and this motion is made in good faith and not for the purposes of delay.

24 **RESPECTFULLY SUBMITTED** this 23rd day of October, 2017.

25 ADAM PAUL LAXALT  
 Attorney General

26  
 27 By: /s/ Matthew S. Johnson  
 MATTHEW S. JOHNSON (Bar No. 12412)  
 Deputy Attorney General  
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11 Petitioner(s),  
12 vs.  
13 BRIAN WILLIAMS,  
14 Respondent(s).

Case No. 2:12-cv-01609-APG-NJK

**DECLARATION OF COUNSEL**

15 I, MATTHEW S. JOHNSON, hereby state that the assertions of this declaration are true:

16 1. I am an attorney licensed to practice law in the State of Nevada and qualified and  
17 admitted to practice before this Court. I am employed as a Deputy Attorney General in the Office of the  
18 Nevada Attorney General. Pursuant to this employment, I have been assigned to represent the  
19 respondents in *Ivan Dominguez v. Brian E. Williams, et al.*, Case No. 2:12-cv-01609-APG-NJK.

20 2. On September 5, 2017, this Court gave respondent forty-five (45) days to answer or  
21 otherwise respond to Dominguez's first-amended petition. ECF No. 66.

22 3. The current deadline is today: October 23, 2017.

23 4. I have not been able to devote sufficient time to preparing a response in this case because  
24 of obligations in other state and federal cases to which I am assigned. In addition, I will be leaving the  
25 employment of the Office of the Attorney General on October 27, 2017, and do not anticipate that I will  
26 be able to respond to the allegations in Dominguez's petition during that time because of my obligations  
27 in other state and federal cases. In the ensuing week my more than 150 state and federal cases will be  
28 assigned to other attorneys in the office.

