| 1 | ADAM PAUL LAXALT | | |
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| 2 | Attorney General MATTHEW S. JOHNSON (Bar No. 12412) | | |
| 3 | Deputy Attorney General State of Nevada | | |
| 4 | Office of the Attorney General 100 North Carson Street | | |
| 5 | Carson City, Nevada 89701-4717 Telephone: (775) 684-1272 | | |
| 6 | Fax: (775) 684-1108 MJohnson@ag.nv.gov | | |
| 7 | Attorney for Respondents | | |
| 8 | UNITED STATES | S DISTRICT COURT | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | IVAN DOMINGUEZ, | Case No. 2:12-cv-01609 - APG-NJK | |
| 11 | Petitioner(s), | UNOPPOSED MOTION FOR ENLARGEMENT OF TIME | |
| 12 | vs. | | |
| 13 | BRIAN E. WILLIAMS, | ORDER | |
| 14 | Respondent(s). | | |
| 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 | f 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 | By: | /s/ Matthew S. Johnson | |
| 27 | by. | MATTHEW S. JOHNSON (Bar No. 12412) Deputy Attorney General | |
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| 7 | Attorney for Respondents | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | IVAN DOMINGUEZ, | Case No. 2:12-cv-01609-APG-NJK | |
| 11 | Petitioner(s), | DECLARATION OF COUNSEL | |
| 12 | vs. | DECLARATION OF COUNSEL | |
| 13 | BRIAN WILLIAMS, | | |
| 14 | Respondent(s). | | |
| 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. | | |

| 1 | 5. Accordingly, I am requesting an additional sixty (60) days, from the October 23, 2017 | | |
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| 2 | due date, in which to prepare and file a response in this case. This is my first request for an enlargement | | |
| 3 | of time for this response. | | |
| 4 | 7. On October 23, 2017, I contacted counsel for petitioner, David K. Neidert, and he | | |
| 5 | indicated that he is not opposed to respondents' motion for an enlargement of time. | | |
| 6 | Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the foregoing is true | | |
| 7 | and correct. | | |
| 8 | Executed on this 23rd day of October, 2017. | | |
| 9 | By: <u>/s/ Matthew S. Johnson</u> MATTHEW S. JOHNSON (Bar No. 12412) | | |
| 10 | Deputy Attorney General | | |
| 11 | | | |
| 12 | | | |
| 13 | IT IS SO ORDERED. | | |
| 14 | Dated: October 25, 2017. | | |
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| 16 | a | | |
| 17 | UNITED STATES DISTRICT JUDGE | | |
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