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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

11 MICHAEL B. WADSWORTH,)
)
12 Petitioner,)
)
13 vs.)
)
14 BRIAN E. WILLIAMS, et al.,)
)
15 Respondents.)

Case No. 2:13-cv-00401-GMN-GWF

MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)
AND ORDER THEREON

16 Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of
17 Nevada, hereby respectfully move this Court for an order granting a forty-five (45) day enlargement of
18 time, to and including September 3, 2015, in which to file and serve their answer to the remaining claims
19 of Wadsworth's petition.

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

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13 vs.)
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14 BRIAN E. WILLIAMS, et al.,)
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15 Respondents.)

Case No. 2:13-cv-00401-GMN-GWF

DECLARATION OF COUNSEL
JEFFREY M. CONNER

16
17 I, JEFFREY M. CONNER, declare under penalty of perjury:

18 1. I am an Assistant Solicitor General employed by the Office of the Attorney General of the
19 State of Nevada, and I make this declaration on behalf of Respondents' motion for enlargement of time in
20 the above-captioned matter.

21 2. By this motion, I am requesting an enlargement of forty-five (45) days, to and including
22 September 3, 2015, to file Respondents' answer to the remaining claims of Wadsworth's petition in
23 compliance with this Court's order dated June 5, 2015. (ECF No. 50.) This is my first request for an
24 enlargement with respect to this answer.
25

26 3. Since this Court ordered Respondents to answer Wadsworth's remaining claims, I have
27 been busy working on other federal and state matters, including: Nevada v. Torres, Case No. 14A1064
28 (Supreme Court of the United States); Rudin v. Myles, 12-15362 (9th Cir.); Camp v. Neven, Case No. 13-

1 15862 (9th Cir.); Elvik v. Baker, Case Nos. 13-17530 & 14-15126 (9th Cir.); Comstock v. Humphries,
2 Case No. 14-15311 (9th Cir.); Gutierrez v. Williams, 2:10-cv-00109; Mack v. Baker, Case No. 3:12-cv-
3 00104; Redeker v. Neven, 2:12-cv-00397; Chavez v. LaGrand, Case No. 3:13-cv-00548; Rico-Arreola
4 v. Smith, Case No. 3:13-cv-00580; Lokken v. LeGrand, Case No. 3:13-cv-00608; Somee v. Hobbs, Case
5 No. 2:13-cv-01190; Sahagun v. Williams, 2:14-cv-00539; and Bergna v. Baca, 15-EW-0014-1B (First
6 Judicial District Court). Accordingly, Respondents respectfully request that this Court issue an order
7 granting them an enlargement of forty-five (45) days, to and including September 3, 2015, to file their
8 answer to Wadsworth's remaining claims.

9
10 4. I informed opposing counsel, Assistant Federal Defender Megan Hoffman, of my
11 intention to seek an enlargement of time, and she indicated she has no objection to Respondents'
12 request for additional time.

13 5. This motion for enlargement of time is made in good faith and not for the purpose of
14 unduly delaying the ultimate disposition of this case

15 I declare under penalty of perjury that the foregoing is true and correct.

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17 /s/ Jeffrey M. Conner
18 JEFFREY M. CONNER
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 20th day of July, 2015, I served a copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST), by U.S. District Court CM/ECF electronic filing to:

MEGAN C. HOFFMAN
Assistant Federal Public Defender
411 East Bonneville Avenue, Suite 250
Las Vegas, Nevada 89101

/s/ Bonnie L. Hunt