

1 DANIEL G. BOGDEN
 United States Attorney
 2 District of Nevada
 Nevada Bar No. 2137
 3 DANIEL D. HOLLINGSWORTH
 Assistant United States Attorney
 4 Nevada Bar No. 1925
 United States Attorney's Office
 5 333 Las Vegas Boulevard South, Suite 5000
 Las Vegas, Nevada 89101
 6 Telephone: 702-388-6336
 Facsimile: 702-388-6787
 7 Email: Daniel.Hollingsworth@usdoj.gov
 Attorneys for the Federal Defendants and the United States

8
 9
 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**
 12

13 FRANCES M. WEEKS-ANDEREGG,)
)
 14 Plaintiff,)
)
 15 v.) 2:13-CV-00610-GMN-(VCF)
)
 16 UNITED STATES OF AMERICA; CIVIL AIR)
 PATROL FOUNDATION, INC., an Alabama)
 17 Domestic Non-Profit Corporation d/b/a CIVIL)
 AIR PATROL, INC.; DOES I-XV, inclusive;)
 18 and ROE BUSINESS ENTITIES I-XV,)
 inclusive,)
 19)
 Defendants.)
 20

21 **UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO EXTEND TIME TO FILE**
 22 **REPLIES TO OBJECTION TO SUBSTITUTION OF UNITED STATES OF AMERICA AS**
 23 **DEFENDANT (ECF NO. 10), PLAINTIFF'S OPPOSITION TO MOTION TO STAY**
DISCOVERY (ECF NO. 11), and PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS
(ECF NO. 12)
(Third Request)

24 The United States of America ("United States"), by and through Daniel G. Bogden, United States
 25 Attorney for the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney,
 26 respectfully moves this Honorable Court for an Order extending the time, pursuant to Fed. R. Civ. P.

1 6(b), LR 6-1, and LR 6-2, for the United States to file responsive pleadings. The deadline to file the
2 Replies is currently June 18, 2013. The United States requests to and including July 26, 2013, to file the
3 Replies. This is the third request for extensions of time. The grounds for extending the time are as
4 follows.

5 An individual of the Civil Air Patrol (“CAP”) had medical issues, was in the hospital, and will
6 return to his CAP office on June 17, 2013. The attorney for the Air Force has had personal matters that
7 relate to serious medical issues for a family member and will be out for the next few weeks, assisting in
8 the medical and rehabilitation of that family member. The undersigned attorney will be unavailable for
9 the next couple of weeks on personal matters and has had to respond to numerous criminal cases (that
10 went to trial) regarding criminal forfeiture and criminal forfeiture money judgment issues, address
11 numerous civil forfeiture cases, additional civil defensive cases, and had to respond to a Writ of
12 Mandamus on short notice.

13 Additionally, although undersigned counsel has addressed numerous civil forfeiture in rem cases
14 and criminal forfeiture cases either by filing the necessary pleadings or by requesting extensions of time,
15 he still cannot meet all of the deadlines in these cases and needs extensions of time in this case to file the
16 Replies. The United States needs additional time for the necessary people to provide the necessary
17 information and documents to prepare the Replies. The United States requests this Court allow the
18 United States to and including July 26, 2013, to file the Replies.

19 On June 13, 2013, undersigned counsel for the United States called Robert S. Cardenas, counsel
20 for Plaintiff, who did not object to and agreed to the extensions of time to file the Replies.

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

1 This motion is not submitted solely for the purpose of delay or for any other improper purpose.
2 Based on Fed. R. Civ. P. 6(b), LR 6-1, and LR 6-2 and the forgoing reasons, this Court should grant an
3 extension of time to and including June 18, 2013, for the United States to file the Replies.

4 DATED this 13th day of June, 2013.

5 DANIEL G. BOGDEN
6 United States Attorney

7 /s/Daniel D. Hollingsworth
8 DANIEL D. HOLLINGSWORTH
9 Assistant United States Attorney

10 **ORDER**

11 **IT IS HEREBY ORDERED** that the United States' request for extension of time to file
12 its Reply to Plaintiff's Objection to Substitution of United States of America as Defendant (ECF
13 No. 10) and Plaintiff's Opposition to Motion to Dismiss (ECF No. 12) is hereby GRANTED.
14 The United States of America shall have through and including **July 26, 2013**, to file its replies
to the aforementioned Objection (ECF No. 10) and Opposition (ECF No. 12).

15 **DATED** this 3rd day of July, 2013.

16
17 
18 _____
19 Gloria M. Navarro
20 United States District Judge
21
22
23
24
25
26