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3 Appellate Division
100 North Carson Street
4 Carson City, Nevada 89701-4717
Telephone: (775) 684-1200
5
6 Attorney for Respondents

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

11 CARL BRADLEY,)
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Petitioner,

vs.

ATTORNEY GENERAL OF THE STATE OF
NEVADA, *et al.*,

Respondents.

Case No. 2:13-cv-01196-RFB-GWF

MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)

17 Respondents, by and through counsel, Catherine Cortez Masto, Attorney General of the State of
18 Nevada, hereby respectfully move this Court for an order granting a fourteen (14) day enlargement of
19 time, to and including October 6, 2014, in which to file and serve their responsive pleading addressing
20 the issue of timeliness only.

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

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

RESPECTFULLY SUBMITTED this 22nd day of September, 2014.

CATHERINE CORTEZ MASTO
Attorney General

By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER
Deputy Attorney General

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge
DATED this 16th day of October, 2014.

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DECLARATION OF COUNSEL
JEFFREY M. CONNER

17 1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of
18 Nevada in the Appellate Division, and I make this declaration on behalf of Respondents' motion for
19 enlargement of time in the above-captioned matter.

20 2. By this motion, I am requesting a fourteen (14) day enlargement of time, to and including
21 October 6, 2014, to comply with this Court's order of July 24, 2014, requiring a responsive pleading
22 addressing the issue of timeliness only. (ECF No. 10.) This is my first request for an enlargement.

23 3. Since this Court ordered Respondents to file a responsive pleading addressing the issue
24 of timeliness, I have been busy working on this case and other federal and state habeas corpus
25 matters, including: White v. Neven, Case No. 12-15033 (Ninth Circuit Court of Appeals); Mack
26 v. Baker, Case No. 3:12-cv-00104; Estes v. LaGrand, Case No. 3:13-cv-00072; Ford v. Williams,
27 Case No. 2:13-cv-00087; Casillas-Gutierrez v. LeGrand, Case No. 3:13-cv-00448; Chambers v. Neven,
28 Case No. 2:13-cv-00489; Duke v. Neven, Case No. 2:13-cv-00688; Alcaraz v. Williams,

1 Case No. 2:13 cv-00818; Tagle v. Neven, Case No. 2:13-cv-01832; White v. McDaniel,
2 Case No. 01-01269C (First Judicial District Court of the State of Nevada); and Edwards v. Warden,
3 Case No. PI 08-0659 (Sixth Judicial District Court of the State of Nevada). As a result of my busy
4 schedule, Respondents require additional time to complete a response that complies with this Court's
5 July 24, 2014 order. Accordingly, Respondents respectfully request that this Court issue an order
6 granting Respondents an extension of fourteen (14) days, to and including October 6, 2014, to file their
7 response.

8 4. This motion for enlargement of time is made in good faith and not for the purpose of
9 unduly delaying the ultimate disposition of this case

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

11 By: /s/ Jeffrey M. Conner
12 JEFFREY M. CONNER

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 22nd day of September, 2014, I served a copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST), by placing said document in the U.S. Mail, postage prepaid, addressed to:

Carl Bradley #43838-048
USP
P. O. Box 1000
Lewisburg, PA 17837

/s/ Laurie Sparman

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