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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CARL BRADLEY,

11 Petitioners,

12 vs.

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

14 Respondents.
15

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

**MOTION FOR ENLARGEMENT OF TIME
(SECOND REQUEST)**

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 five (5) day enlargement of time,
18 to and including August 1, 2018, in which to file and serve their reply.

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 one prior enlargement of Respondents' time to file said reply, and this motion
23 is made in good faith and not for the purposes of delay.

24 RESPECTFULLY SUBMITTED this 26th day of July, 2018.

25 ADAM PAUL LAXALT
Attorney General

26 By: /s/ Jeffrey M. Conner
27 JEFFREY M. CONNER (Bar. No. 11543)
Assistant Solicitor General
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14 NEVADA, *et al.*,

15 Respondents.

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

DECLARATION OF COUNSEL

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

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

20 2. Respondents reply in support of the motion to dismiss is due July 27, 2018. By this
21 motion, I am requesting an enlargement of five (5) days, to and including August 1, 2018. This is
22 Respondents' second request for an enlargement to file the reply.

23 3. While preparing the reply in this matter, I discovered that Bradley had inadvertently
24 filed the wrong declaration in support of his opposition to the motion to dismiss. After informing
25 opposing counsel of the discrepancy, Bradley filed a corrected image. ECF No. 85. In addition to the
26 fact that I have numerous filing deadlines in various state and federal matters over the next few days, I
27 need additional time to adequately review the declaration and complete the reply. Accordingly,

28 ///

1 Respondents respectfully request that this Court issue an order granting them an enlargement of five (5)
2 days to, and including, August 1, 2018, to file a reply in support of the motion to dismiss.


3 4. Although opposing counsel, Assistant Federal Defender Amelia Bizzaro, is currently out
4 of the office, her legal assistant, Jessica Pillsbury, informed me that they do not oppose Respondents'
5 request for additional time.

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

8
9 By: /s/ Jeffrey M. Conner
10 JEFFREY M. CONNER (Bar. No. 11543)
Assistant Solicitor General

11 APPROVED:

12 DATED this 9th day of August, 2018.

13
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15 
16 RICHARD F. BOULWARE, II
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that
3 on the 26th day of July, 2018, I caused to be served a copy of the foregoing **MOTION FOR**
4 **ENLARGEMENT OF TIME (SECOND REQUEST)**, by U.S. District Court CM/ECF Electronic

5 Filing to:

6 Amelia L. Bizzaro
7 Assistant Federal Public Defender
8 411 East Bonneville Ave, Suite 250
9 Las Vegas, NV 89101

10 /s/ Amanda White