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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 PRISCELLA R. SAINTAL,

13 Petitioner,

14 v.

15 SHERYL FOSTER, ET AL.,

16 Respondents.
17

Case No. 2:13-cv-01295-APG-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
REPLY TO ANSWER**

(SECOND REQUEST)

18 Petitioner Priscella Saintal, by counsel, moves this Court for the entry of Order
19 extending the time within which she must file her Reply to Respondents' Answer by
20 30 days from May 21, 2018 to and including June 20, 2018. Saintal's request is based
21 on the record in this case and the attached Points and Authorities. The state, by
22 Senior Deputy Attorney General Victor-Hugo Schulze II, does not object to this
23 request.
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26

1 **POINTS AND AUTHORITIES**

2 1. Undersigned counsel filed her appearance on August 22, 2017, to
3 represent Ms. Saintal (ECF No. 43).

4 2. This is Saintal's second request for an extension of time. This motion is
5 not filed for the purposes of delay but in the interests of justice, as well as in the
6 interests of Saintal.

7 3. Counsel's schedule and circumstances beyond her control have
8 precluded her from meeting the current deadline of May 21, 2018. There are several
9 issues counsel should discuss with Saintal before filing the Reply; counsel is in the
10 process of setting up a meeting with Saintal. In addition, counsel is filing a petition
11 next week, has a hearing the following week, and will file at least two other pleadings
12 next week. Counsel is also preparing for oral argument in June.

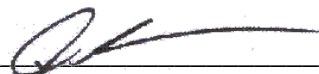
13 4. Senior Deputy Attorney General Victor-Hugo Schulze II has no objection
14 regarding her requested extension. This lack of objection does not constitute a waiver
15 of any procedural defenses.

16 5. The requested extension is necessary for counsel to complete her review
17 of the case and to draft and file the Reply to Answer. For these reasons, as well as the
18 record in this case, Saintal respectfully asks this Court to grant her request to extend
19 the time for filing an opposition by 30 days until June 20, 2018.

20
21 **ORDER**

22
23 **IT IS SO ORDERED.**

24 Dated: May 21, 2018.

25 
26 _____
UNITED STATES DISTRICT JUDGE

1 Dated this 21st day of May, 2018.

2 Respectfully submitted,

3 RENE L. VALLADARES
4 Federal Public Defender

5 */s/ Kimberly Sandberg*

6 KIMBERLY SANDBERG
7 Assistant Federal Public Defender

8
9 IT IS SO ORDERED:

10
11
12 _____
13 United States District Judge

14 Dated: _____