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 13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 KENNETH FRIEDMAN, #80952)

16 Plaintiff,)

17 vs.)

18 LINDA ADAMS, et al.,)

19 Defendants.)

CASE NO.: 2:13-cv-01345-JCM-CWH

**DEFENDANTS' MOTION FOR
 ENLARGEMENT OF TIME TO
 RESPOND TO PLAINTIFF'S MOTIONS
 UNDER DKT. NUMBERS 35-37
 (FIRST REQUEST)**

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 21 Defendants Robert Bannister, Joseph Hanson, Linda Adams and Doni K. Jennings, by
 22 and through counsel, ADAM PAUL LAXALT, Attorney General of the State of Nevada, and
 23 CAROLINE BATEMAN, Deputy Attorney General, hereby move for an enlargement of time for

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1 the filing of their responses to Plaintiff's Motions under Dkt. Numbers 35-37 pursuant to Local
2 Rule 6-1.

3 DATED this 22nd day of June, 2015

4 Respectfully submitted,
5 ADAM PAUL LAXALT
6 Nevada Attorney General

7 By: /s/ Caroline Bateman
8 CAROLINE BATEMAN
9 Deputy Attorney General
10 *Attorneys for Defendants*
11 *Robert Bannister, Joseph Hanson,*
12 *Linda Adams, and Doni K. Jennings*

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. PROCEDURAL HISTORY**

14 This is a *pro se* civil rights action filed by Plaintiff Kenneth Friedman ("Plaintiff"), who is
15 an inmate in the custody of the Nevada Department of Corrections. On June 3, 2015, Plaintiff
16 filed the following motions: Plaintiff's Second Motion to Compel Discovery (Dkt. #35); Plaintiff's
17 Motion for Sanctions regarding Discovery (Dkt. #36); and Plaintiff's Motion to Extend
18 Discovery (Dkt. #37). Defendants now move for an enlargement of time of five (5) days to
19 respond to Plaintiff's Motion to Compel, Motion for Sanctions, and Motion to Extend
20 Discovery.

21 **II. LEGAL ANALYSIS**

22 The Court has broad discretion in supervising the pretrial phase of litigation. See
23 *Zivkovic v. S. Cal. Edison Co.*, 302 F.3d 1080, 1087 (9th Cir. 2002). Under LR 6-1, a motion
24 for extension of time must state the reasons for the extension requested and inform the Court
25 of any previous extensions granted.

26 Defendants respectfully request that this Court find that they have demonstrated good
27 cause for their first requested extension to respond to Plaintiff's Motions under Dkt. Numbers
28 35-37. Undersigned counsel for Defendants recently took over the representation of this case

1 from prior counsel. As the contents of Plaintiff's motions concern discovery that was
2 completed by prior counsel, as well as conversations between Plaintiff and prior counsel,
3 Defendants request an enlargement of time so that current counsel can confer with prior
4 counsel and provide accurate responses to Plaintiff's motions.

5 As such, Defendants' counsel respectfully requests the deadline for responses to Dkts.
6 35-37 be continued for a period of five (5) days.

7 **III. CONCLUSION**

8 Based on the foregoing, Defendants respectfully request an extension of five (5) days
9 to file their responses to Plaintiff's Motions under Dkt. Numbers 35-37.

10 DATED this 22nd day of June, 2015

11 Respectfully submitted,

12 ADAM PAUL LAXALT
13 Nevada Attorney General

14 By: /s/ Caroline Bateman
15 CAROLINE BATEMAN
16 Deputy Attorney General
17 *Attorneys for Defendants*
Robert Bannister, Joseph Hanson,
Linda Adams, and Doni K. Jennings

18 **ORDER**

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20 IT IS SO ORDERED.

21 DATED: June 23, 2015

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23 _____
24 United States Magistrate Judge
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of the State of Nevada, Office of the Attorney
3 General, and that on the 22nd day of June, 2015, I served the foregoing, **DEFENDANTS'**
4 **MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S MOTIONS**
5 **UNDER DKT. NUMBERS 35-37 (FIRST REQUEST)**, by causing a true and correct copy
6 thereof to be filed with the Clerk of the Court, using the electronic filing system, and by
7 causing a true and correct copy thereof to be delivered to the Department of General
8 Services, for mailing at Las Vegas, Nevada, addressed to the following:

9 Martinez S. Aytch #54102
10 Lovelock Correctional Center
11 1200 Prison Road
12 Lovelock, Nevada 89419
13 *Plaintiff, Pro Se*

14 /s/ Carol A. Knight
15 CAROL A. KNIGHT
16 An employee of:
17 STATE OF NEVADA
18 OFFICE OF THE ATTORNEY GENERAL
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