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 8 *Attorney for Petitioner Reynaldo Agavo

9
 10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 Reynaldo Agavo,
 13 Petitioner,
 14 v.
 15 Dwight Neven, et al.,
 16 Respondents.

Case No. 2:13-cv-01741-JCM-DJA
**Unopposed motion for extension of
 time in which to file reply in
 support of petition**
(Third request)

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 18 Reynaldo Agavo respectfully moves this Court for an extension of time of
 19 twenty-eight (28) days, from December 20, 2019, to and including January 17, 2020,
 20 in which to file a reply in support of the merits of his second amended petition.
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1 opening brief due on January 2, 2020, in *Guzman v. Gittere*, Case No. 79519 (Nev.
2 Sup. Ct.); a reply brief due on January 2, 2020, in *Rosales v. Baker*, Case No. 78735
3 (Nev. Sup. Ct.); a petition for a writ of certiorari due on January 3, 2020, in *Ramet v.*
4 *LeGrande*, Case No. 19A573 (U.S. Sup. Ct.); an opposition to a motion to dismiss due
5 on January 6, 2020, in *Palmer v. Filson*, Case No. 3:18-cv-00245-HDM-CLB (D. Nev.);
6 an opening brief due on January 10, 2020, in *Palmer v. Gittere*, Case No. 79397 (Nev.
7 Sup. Ct.); a petition for a writ of certiorari due on February 5, 2020, in *Major v. Baker*,
8 Case No. 76716 (Nev. Sup. Ct.) (U.S. Sup. Ct. Case No. not yet assigned); an amended
9 petition due on February 10, 2020, in *Brown v. Baker*, Case No. 3:19-cv-00258-LRH-
10 WGC (D. Nev.); and an amended petition due on February 13, 2020, in *Cordova v.*
11 *Baca*, Case No. 3:19-cv-00388-MMD-CLB (D. Nev.), a case for which time remains on
12 the federal statute of limitations.

13 6. Therefore, counsel seeks an additional twenty-eight (28) days, up to and
14 including January 17, 2020, in which to file the reply in support of the petition. This
15 is undersigned counsel's third request for an extension of time in which to file the
16 reply in support of the petition.

17 7. On December 20, 2019, counsel contacted Deputy Solicitor General Jef-
18 frey M. Conner and informed him of this request for an extension of time. As a matter
19 of professional courtesy, Mr. Conner had no objection to the request. Mr. Conner's
20 lack of objection should not be considered as a waiver of any procedural defenses or
21 statute of limitations challenges, or construed as agreeing with the accuracy of the
22 representations in this motion.

23 8. This motion is not filed for the purposes of delay, but in the interests of
24 justice, as well as in the interest of Mr. Agavo. Counsel for Mr. Agavo respectfully
25 requests this Court grant the motion and order Mr. Agavo to file the reply in support
26 of the petition no later than January 17, 2020.

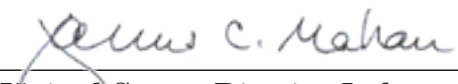
1 Dated December 20, 2019.

2 Respectfully submitted,

3 Rene L. Valladares
4 Federal Public Defender

5 /s/ Jeremy C. Baron
6 Jeremy C. Baron
7 Assistant Federal Public Defender

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10 IT IS SO ORDERED:

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12 
13 United States District Judge

14 Dated: December 20, 2019

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