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7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 JULIUS BRADFORD,
 11 Petitioner,
 12 vs.
 13 WILLIAM GITTERE, et al.
 14 Respondents.

Case No. 2:13-cv-01784-RFB-GWF

**MOTION FOR EXTENSION OF TIME TO
 FILE ANSWER TO SECOND AMENDED
 PETITION FOR WRIT OF HABEAS CORPUS**
(ECF NO. 67)
(THIRD REQUEST)

17 Respondents hereby request an extension of time of 90 days, up to and including February 7,
 18 2019, within which to file their answer to Petitioner Julius Bradford’s Second Amended Petition for Writ
 19 of Habeas Corpus. ECF No. 67. The current due date to file the answer is November 9, 2018. This motion
 20 is supported by the attached declaration of undersigned counsel.

21 Respectfully submitted: November 9, 2018.

22 ADAM PAUL LAXALT
 Attorney General

24 By: /s/ Heidi Parry Stern
 Heidi Parry Stern
 Chief Deputy Attorney General

1 DECLARATION OF HEIDI PARRY STERN

2 STATE OF NEVADA)
3) ss:
4 COUNTY OF CLARK)

5 I, HEIDI PARRY STERN, being first duly sworn under oath, depose and state as follows:

6 1. I am an attorney licensed to practice law in the State of Nevada; qualified and admitted to
7 practice before this Court; employed as a Chief Deputy Attorney General in the Office of the Nevada
8 Attorney General; and pursuant to this employment, I have been assigned to represent Respondents in
9 *Julius Bradford v. Timothy Filson, et al.*, 2:13-cv-01784-RFB-GWF, and as such, have personal
10 knowledge of the matters contained herein.

11 2. This extension is necessary due to my preparation for oral argument in the Ninth Circuit
12 in *Robert Jones v. Jack Palmer, et al.*, Case No. 17-15575, which took place on October 9, 2018, and
13 *Alquandre H. Turner v. Renee Baker, Warden, et al.*, Case No. 17-72044, which will be taking place on
14 November 16, 2018.

15 3. In addition, our office has been short staffed over the past few months due to the retirement
16 of one of the attorneys in our unit and the difficulty in finding a replacement for him.

17 4. That the answer is currently due to be filed on November 9, 2018.

18 5. Respondents request 90 days to file their answer, up to and including February 7, 2019.

19 6. I have contacted opposing counsel, and he has no objection to this request for extension.

20 7. This is Respondents' third motion for extension of time to file their answer to the Second
21 Amended Petition for Writ of Habeas Corpus.

22 8. This motion for extension of time is made in good faith and not for the purpose of delay.

23 FURTHER DECLARANT SAYETH NAUGHT.

24 DATED: this 9th day of November, 2018

25 IT IS SO ORDERED:

26 /s/ Heidi Parry Stern
Heidi Parry Stern (Bar No. 8873)
Chief Deputy Attorney General

27 

28 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 14th day of November, 2018.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing *Motion for Extension of Time to File*
3 *Answer to Second Amended Petition for Writ of Habeas Corpus (ECF No. 67) (Third Request)* with the
4 Clerk of the Court by using the CM/ECF system on November 9, 2018.

5 The following participants in this case are registered electronic filing systems users and will be
6 served electronically:

7 Jeremy Baron, Esq.
8 Megan Hoffman, Esq.
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14 /s/ R. Carreau
15 An employee of the Office of the Attorney General