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6 Attorney for Plaintiff
 7 VICTORIA ZARANDIOUN

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

11 VICTORIA ZARANDIOUN) Case No.: 2:14-cv-00008
)
 12 Plaintiff,)
 vs.)
)
 13)
 U.S. DEPT. OF HOMELAND SECURITY)
 14 Defendant,)
 _____)

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 16 **UNOPPOSED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE**
 17 **DISCOVERY PLAN/SCHEDULING ORDER**
 18 **(FIRST REQUEST)**

19 Pursuant to Federal Rule of Civil Procedure 6(b) and LR 6-2 VICTORIA F.
 20 ZARANDIOUN (“Plaintiff”) respectfully makes this unopposed motion requesting a thirty (30)
 21 day extension to file the Discovery Plan/Scheduling Order. Currently, the Parties are scheduled
 22 to submit their Discovery Plan/Scheduling Order on November 10, 2014. The grounds for the
 motion are as follows:

23 New information has come to light regarding Plaintiff’s case and undersigned counsel
 24 needs additional time to conduct further research, consult with the Plaintiff, and contact
 25 Plaintiff’s previous legal counsel. The Parties are contemplating resolving this case without
 26 having to proceed to trial.

27 Undersigned counsel contacted opposing counsel, Mr. John Inkeles on November 4,
 28 2014, who advised that he has no objection to the requested extension. This extension will

1 prejudice neither party, but rather will facilitate the efficient disposition of this matter. Should
2 such filing still be necessary, the Parties will comply no later than 5 p.m. EST, on December 10,
3 2014.

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5 Dated: November 6, 2014

6 Respectfully Submitted,

7 /s/ Emily R. Navasca

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17 **ORDER**

18 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE

Dated: November 7, 2014

1 **CERTIFICATE OF SERVICE**

2 Case No. 2:14-cv-00008

3 I hereby certify that on this 6th day of November, 2014, I served the foregoing pleading
4 on all counsel of record by means of the District Clerk's electronic filing system.

5
6 /s/ Emily R. Navasca
7 Emily R. Navasca
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