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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 * * * *

18 THEODORE LEE,

19 Plaintiff,

20 v.

21 UNITED STATES OF AMERICA,

22 Defendant.

23 _____
24 And related Crossclaims.

Case No. 2:14-cv-00606-RCJ-PAL

**UNOPPOSED MOTION TO
EXTEND JOINT STATUS
REPORT DEADLINE**

25 COMES NOW, Plaintiff THEODORE LEE, by and through his undersigned counsel and
26 hereby moves this Court to issue an order that the deadline to complete the joint status report set
27 forth in Order (Doc. #36) be continued from May 19, 2016 to and including May 20, 2016.

28 Plaintiff sets forth the following in support of this motion:

1. Plaintiff requests additional time to finalize his portion of the joint status report currently
due on May 19, 2016. As such, Plaintiff is requesting an extension of the deadline from May 19,
2016 to May 20, 2016 to file the joint status report.

2. The United States does not oppose Plaintiff's motion to extend deadline for the joint
status report to May 20, 2016, but is nevertheless prepared to meet the current existing deadline.

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3. This motion is not being submitted for the purposes of delay but in order to insure that the Plaintiff has a full and fair opportunity to preserve his claim for a refund of taxes.

DATED this 18th day of May, 2016.

BAILUS COOK & KELESIS, LTD.

/s/ Mark B. Bailus
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Counsel for Plaintiff, Theodore F. Lee

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15 **UNITED STATES DISTRICT COURT**

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And related Crossclaims.

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**[PROPOSED]
ORDER GRANTING UNOPPOSED
MOTION TO EXTEND JOINT
STATUS REPORT DEADLINE**

The Court having read and considered the Unopposed Motion to Extend Joint Status Report Deadline (“Motion”), and for good cause shown:

IT IS HEREBY ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that the deadline to complete the Joint Status Report is extended to and including May 20, 2016.

DATED this 20th day of May, 2016.


UNITED STATES MAGISTRATE JUDGE