



1           **1.     Status Report.** This request is made more than 60 days before the current close  
2 of discovery, which is currently set for **January 18, 2018**. Pursuant to Local Rules 6-1(b) and  
3 26-4, this request is timely in that it is made before the discovery cutoff. However, it is not  
4 timely in that it is made less than 21 days before the deadline of the parties' interim status report  
5 and Federal Defendant's expert disclosure deadlines, which are set for **November 16, 2017**.  
6 Nonetheless, as set forth below, Federal Defendant's request should still be approved because,  
7 as discussed more fully below, this Motion is being filed nine days before the deadline.

8           On October 23, 2017, the Court held a hearing on Plaintiff Tanya Johnson's counsel's  
9 motion to withdraw as counsel (ECF No. 56). The Court granted the motion and gave Plaintiff  
10 until November 27, 2017 to either retain new counsel or file a notice of intent to proceed *pro se*.  
11 ECF No. 62. On October 26, 2017, counsel for Federal Defendant emailed Plaintiff (at the email  
12 address provided by former counsel) regarding the upcoming deadline for the parties' interim  
13 status report, suggesting the parties extend the deadlines by sixty (60) days to account for the  
14 Court's order. On October 30, 2017, counsel for Federal Defendant followed up on her previous  
15 email. To date, Federal Defendant has not received a response from Plaintiff.

16           **2.     Status/Discovery Completed.** Following the Court's order denying Federal  
17 Defendant's motion to dismiss (ECF No. 52), on July 6, 2017, the parties held a conference  
18 pursuant to Fed. R. Civ. P 26(f). The parties have exchanged initial and supplemental  
19 disclosures. On July 21, 2017, the Court entered a Scheduling Order (ECF No. 54). On  
20 September 29, 2017, counsel for Plaintiff filed a motion to withdraw as counsel (ECF No. 56).  
21 On October 10, 2017, Federal Defendant served its first set of interrogatories.

22           **3.     Discovery remaining.** Plaintiff's responses to Federal Defendant's first set of  
23 interrogatories are due on November 27, 2017 and Federal Defendant intends to take Plaintiff's  
24 deposition.

25           **4.     Reasons for extension.** Federal Defendant requests this extension to allow  
26 Plaintiff to determine how she will be proceeding in this case and allow the parties adequate  
27 time to conduct and complete discovery. This request is made in good faith and not for the  
28 purpose of unnecessarily delaying the proceedings.



1 **PROOF OF SERVICE**

2 I, Krystal J. Rosse, hereby certify that the **FEDERAL DEFENDANT'S MOTION TO**  
3 **EXTEND DISCOVERY DEADLINES** was served this date on all parties as indicated below:

4 **U.S. Mail & Electronic Mail:**

5 Tanya E. Johnson  
6 6717 Kyle Stewart Ct.  
7 North Las Vegas, Nevada 89086  
8 tidget@cox.net

9 Dated this 7th day of November 2017.

10 */s/ Krystal J. Rosse*  
11 KRYSTAL J. ROSSE  
12 Assistant United States Attorney

13 IT IS SO ORDERED.

14 Dated: November 8, 2017

15   
16 UNITED STATES MAGISTRATE JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28