XAVIER GONZALES, ESQ. 1 Nevada Bar No.: 1862 2 528 S. Casino Center Blvd Las Vegas, NV 89101 3 (702)388-8182 Attorney for Petitioner 4 UNITED STATES DISTRICT COURT 5 DISTRICT OF NEVADA 6 QASIR AL MUKHTAR, 7 CASE NO: 2:14-cv-01441-RFB-CWH Plaintiff, 8 PLAINTIFF'S UNOPPOSED VS. MOTION FOR ENLARGEMENT 9 OF TIME TO FILE REPLY TO THE UNITED STATES OF AMERICA, et al., ) DEFENDANT'S MOTION TO 10 **DISMISS PURSUANT TO** 11 Defendants, FRCP 6(b)(1)(A) 12 arybargler 13 Comes now QASIR AL MUKHTAR, by and through his Attorney, XAVIER GONZALES, ESQ. hereby files a MOTION FOR ENLARGEMENT OF TIME to file it's 16 Reply to the Motion to Dismiss / Lack of Jurisdiction, filed with the Court on September 8th 17 2015. 18 This motion is made and based upon Federal Rule of Civil Procedure FRCP 6, no. 19 previous request for an extension has been requested. 20 Respectfully submitted this 18th day of September, 2015. 21 22 23 24 By: /s/ Xavier Gonzales, Esq. XAVIER GONZALES, ESO. 25 528 S. Casino Center Blvd, Ste 205 Las Vegas, NV 89101 26 Attorney for Petitioner 27 28

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In support of the instant Motion, the Plaintiff submits the following:

- The Motion to Dismiss/Lack of Jurisdiction was filed with the Court on September 8<sup>th</sup> 2015.
- 2. On September 16<sup>th</sup> 2015, Counsel for Plaintiff contacted counsel for Defendant, John J. W. Inkeles Esq., advising him that we had received the Motion to Dismiss/Lack of Jurisdiction which was a comprehensive filing, and since the issues in the matter are significantly complex and require a thorough review of the facts and law, and that additional time is being requested for thorough review.
- 3. I advised of a minimum of 45 days to respond to the Defendant's Motion to Dismiss the Petition.
- 4. John J. W. Inkeles Esq., stated on September 16<sup>th</sup> 2015 he had not objection to Plaintiff's Motion for an Enlargement of Time of 45 days.

Therefore, it is hereby requested an additional 45 days from today's date to file a reply as is requested. This Motion is made in good faith and not for the purposes of delay, and it is believed neither party is prejudiced by the instant request for enlargement of time.

Respectfully submitted this 18th day of September, 2015.

By: /s/ Xavier Gonzales, Esq.
XAVIER GONZALES, ESQ.
528 S. Casino Center Blvd, Ste 205
Las Vegas, NV 89101
Attorney for Petitioner

IT IS SO ORDERED.

DATED this 18th day of September, 2015.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE