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6 Attorney for Respondents/
Jo Gentry and the State of Nevada Office of the Attorney General
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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

11 KAREN BODDEN,)
12)
Petitioner,)
13 vs.)
14 JO GENTRY, *et al.*,)
15 Respondents.)

Case No. 2:14-cv-01968-RFB-NJK

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

16 Respondents, by and through counsel, ADAM PAUL LAXALT, Attorney General of the State of
17 Nevada, respectfully move this court for an order granting a sixty (60) day enlargement of time, from the
18 from July 5, 2016, the date this Court ordered respondents to answer or otherwise respond to the amended
19 petition, ECF No. 10, in which to respond to Karen Bodden's (Bodden) amended petition for a writ of
20 habeas corpus filed on June 2, 2016.

21 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
22 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
23 other materials on file herein.

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1 No. 16 EW 00020 1(B) (response filed in the First Judicial District Court of the State of Nevada on
2 June 16, 2016); *Drake v. McDaniel et. al.*, Case No. 16 EW 00028 1(B) (response filed in the First
3 Judicial District Court of the State of Nevada on June 16, 2016); *Krehnovi v. Neven, et. al.*, Case No.
4 2:15-cv-01645-JAD-GWF (answer filed in the United States District Court for the District of Nevada
5 on June 17, 2016). I am currently preparing an opposition to application for a certificate of
6 appealability in *Marquez v. Baker et. al.*, CA NO. 16-16634.

7 5. On June 20, 2016, I contacted Assistant Federal Public Defender Melanie Gavisk about
8 this request. Ms. Gavisk does not oppose the request for an extension of time.

9 6. Accordingly, I am requesting an additional sixty (60) days, from July 5, 2016, the date
10 this Court ordered respondents to answer or otherwise respond to the amended petition, ECF No. 10, in
11 which to respond to Karen Bodden's (Bodden) amended petition for a writ of habeas corpus filed on June
12 2, 2016. This is my first request for an enlargement of time.

13 Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the foregoing is
14 true and correct.

15 Executed this 22nd day of June, 2016.

16 /s/ Matthew S. Johnson
17 MATTHEW S. JOHNSON
18 Deputy Attorney General
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on June 22, 2016, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**, by the U.S. District Court’s electronic filing system, CM/ECF, to:

Megan Hoffman
Federal Public Defender
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Las Vegas, Nevada 89101
Megan_hoffman@fd.org

/s/ Mary Wilson
An employee of the
Office of the Attorney General