1	ADAM PAUL LAXALT					
2	Attorney General MATTHEW S. JOHNSON					
3	Deputy Attorney General Nevada Bar No. 12412					
4	California Bar No. 290630 100 North Carson Street					
5	Carson City, Nevada 89701-4717 (775) 684-1272					
6	MJohnson@ag.nv.gov Attorney for Respondents/					
7	Jo Gentry and the State of Nevada Office of the Attorney General					
8	IN THE UNITED STATES DISTRICT COURT					
9	FOR THE DISTRICT OF NEVADA					
10						
11	KAREN BODDEN,)Case No. 2:14-cv-01968-RFB-NJK					
12	Petitioner,					
13	vs.) UNOPPOSED MOTION FOR ENLARGEMENT OF TIME					
14	JO GENTRY, et al.,					
15	Respondents.					
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	There have been no prior enlargements of respondents' time to file said response, and this
	2	motion is made in good faith and not for the purposes of delay.
	3	RESPECTFULLY SUBMITTED this 22 nd day of June, 2016.
	4	ADAM PAUL LAXALT Attorney General
	5	By: <u>/s/ Matthew S. Johnson</u>
	6	MATTHEW S. JOHNSON Deputy Attorney General
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	8	IT IS SO ORDERED this <u>12th</u> day of <u>July</u> , 2016.
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	11	RICHARD F. BOULWARE, II United States District Judge
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5	Carson City, Nevada 89701-4717 (775) 684-1272 MJohnson@ag.nv.gov Attorney for Respondents/ Jo Gentry and the State of Nevada Office of the Attorney General IN THE UNITED STATES DISTRICT COURT							
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9	FOR THE DISTRICT OF NEVADA							
10	KAREN BODDEN,) Case No. 2:14-cv-01968-RFB-NJK						
11	Petitioner,							
10	vs.) <u>DECLARATION OF COUNSEL</u>						
12	v5.							
12 13	JO GENTRY, et al.,							
13	JO GENTRY, et al., Respondents.	y state that the assertions of this declaration are true:						

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admitted to practice before this Court. I am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. Pursuant to this employment, I have been assigned to represent the respondents in Karen Bodden v. Jo Gentry, et al Case No. 2:14-cv-01968-RFB-NJK.

20 2. On June 30, 2015, this Court directed respondents to answer, or otherwise respond to 21 Bodden's 81-page amended petition within 30 days after it was filed; July 5, 2016. ECF No. 10.

3. Respondents requested the complete record for this case on July 15, 2015, but since the filing of Bodden's amended petition on June 2, 2016, it has recently come to my attention that the entire record and all of the pertinent documents necessary to respond to the amended petition were not 25 provided to respondents by the district court clerk's office.

26 4. In addition, I have not been able to devote sufficient time to preparing a response to the 27 amended petition because of obligations in other cases, including: Morales v. D.W. Neven, et al, Case 28 No. 2:15-cv-00185-GMN-CWH (motion to dismiss filed on June 8, 2016); French v. Wickman, Case

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

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

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

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

Executed this 22nd day of June, 2016.

/s/ Matthew S. Johnson MATTHEW S. JOHNSON Deputy Attorney General

	1	CERTIFICATE OF SERVICE
	1 2	I certify that I am an employee of the Office of the Attorney General and that on June 22, 2016,
	3	I served a copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME, by
	4	the U.S. District Court's electronic filing system, CM/ECF, to:
	5	
	6	Megan Hoffman Federal Public Defender 411 East Bonneville Ave Suite 250
	7	Las Vegas, Nevada 89101 Megan hoffman@fd.org
	8	<u>Megan norman(a) no. or g</u>
	9	/s/ Mary Wilson
	10	/s/ Mary Wilson An employee of the Office of the Attorney General
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