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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Gladys Perez,

 Petitioner,

 v.

Dwight Neven, Warden, Florence McClure
Correctional Institution and James
Dzurenda, Director, Nevada Department
of Corrections,

 Respondents.

Case No. 2:14-cv-02087-APG-BNW

**Unopposed Motion to Extend Time
to file Supplemental Opposition to
Motion to Dismiss**

(First Request)

ORDER

1 **POINTS AND AUTHORITIES**

2 Petitioner Gladys Perez respectfully asks this Court to enter an Order
3 extending her deadline for filing a Supplemental Opposition to the warden’s motion
4 to dismiss by 45 days to June 22, 2020.

5 This is Perez’s first request for an extension of this deadline. Senior Deputy
6 Attorney General Jessica Perlick does not object to this request.

7 Following the February 28, 2020 hearing on Perez’s motion to show case, the
8 parties entered into a stipulation that included a briefing schedule.¹ The transcript
9 of the hearing was filed on April 7, 2020, and discovery was closed on April 6, 2020.²

10 Immediately following the hearing, the parties discussed the possibility of a
11 partial resolution and agreed to discuss the matter in the near future, after
12 opposing counsel, who was new to the case, had a chance to get up to speed. But
13 then COVID-19 happened, and the parties were not able to speak substantively
14 until March 20, 2020. Although the parties had a productive conversation, an
15 agreement could not be reached.

16 Counsel is cognizant of this case’s unique procedural posture and this
17 Court’s prior Orders regarding extensions. However, counsel was not able to
18 complete her Supplemental Opposition. Counsel has been working remotely since
19 March 18, 2020. And although counsel is working full time, she has additional
20 duties and responsibilities related to managing staff of the Non-Capital Habeas
21 Unit remotely. In addition, working remotely has brought its own technological
22 challenges that we are solving as they arise, but which causes tasks to take longer
23 than usual.

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¹ ECF No. 141.

27 ² ECF Nos. 141, 143.

1 Counsel anticipates additional duties and responsibilities as the FPD slowly
2 transitions back to work in the office as the Governor reopens Nevada. Counsel's
3 requested extension takes that into account her time on managerial duties so that
4 she does not have to return to this Court for an additional extension. Baring an
5 extraordinary, unforeseen circumstance, counsel intends to meet this deadline.
6 Accordingly, Perez respectfully asks this Court to extend the time for her to file her
7 Supplemental Opposition by 45 days to June 22, 2020.

8
9 Dated May 6, 2020.

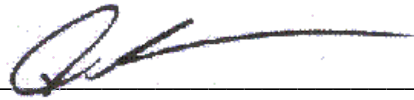
10 Respectfully submitted,

11
12 Rene L. Valladares
13 Federal Public Defender

14 */s/ Amelia L. Bizzaro*

15 _____
16 Amelia L. Bizzaro
17 Assistant Federal Public Defender

18
19 **IT IS SO ORDERED.**

20
21 
22 _____
23 UNITED STATES DISTRICT JUDGE
24 Dated: May 6, 2020.