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12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
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16 Elizabeth Carley,
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18 Petitioner,
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20 v.
21 Jerry Howell, et al.,
22
23 Respondents.

Case No. 2:14-cv-02097-JCM-BNW

**Unopposed motion for extension of
time in which to complete
discovery**

(First request)

24 Elizabeth Carley respectfully moves this Court for an extension of time of forty-
25 three (43) days, from September 2, 2021, to and including October 15, 2021, to com-
26 plete discovery.
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ARGUMENT

The Court granted Ms. Carley leave to conduct discovery. ECF No. 89. The discovery deadline is September 2, 2021.

Counsel respectfully suggests additional time remains necessary to complete discovery. After the Court issued its order, counsel promptly served subpoenas on the three relevant entities (the Nevada gaming board, the Las Vegas police, and the District Attorney's office). The Nevada gaming board responded with a letter on July 15 objecting to the subpoena. Following informal discussions, the gaming board agreed to produce a relevant document on July 30. After that, the District Attorney's office provided a production on August 13. Counsel promptly reviewed that production and determined it may be missing pages. Counsel recently reached out to the District Attorney's office, and the office has agreed to review the issue. Additional informal communications with the District Attorney's office and the Nevada gaming board will likely be necessary to ensure Ms. Carley receives a complete set of relevant documents. Thus, additional time is necessary for Ms. Carley to continue pursuing informal efforts at resolving the discovery issues.

Counsel has had many professional obligations in the past two months and has many additional professional obligations in the next two months. However, because counsel's other deadlines aren't particularly relevant to this extension request, counsel isn't providing an overview of his workload here.

On September 1, 2021, counsel contacted Senior Deputy Attorney General Alison Herr and informed her of this request for an extension of time. As a matter of professional courtesy, Ms. Herr had no objection to the request. Ms. Herr's lack of objection shouldn't be considered a waiver of any procedural defenses or statute of limitations challenges, or construed as agreeing with the accuracy of the representations in this motion.

1 In sum, Ms. Carley requests a forty-three (43) day extension of the deadline to
2 complete discovery, up to and including October 15, 2021. This is counsel's first re-
3 quest to extend the discovery deadline. This motion isn't filed for the purposes of
4 delay, but in the interests of justice, as well as in Ms. Carley's interest. Counsel
5 respectfully requests the Court grant the motion.

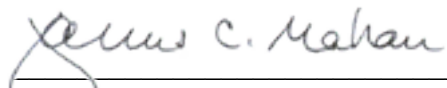
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7 Dated September 2, 2021.

8 Respectfully submitted,

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10 Rene L. Valladares
11 Federal Public Defender

12 /s/ Jeremy C. Baron
13 Jeremy C. Baron
14 Assistant Federal Public Defender

15 IT IS SO ORDERED:

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18 James C. Mahan
19 United States District Judge

20 Dated: September 8, 2021
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