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 District of Nevada

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7 *Attorneys for the United States.*

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 GREGORY M. THOMAS,)	
)	
14 Plaintiff,)	Case No: 2:15-cv-00291-APG-NJK
)	
15 v.)	
)	
16 UNITED STATES OF AMERICA,)	
)	
17 Defendant.)	

19 **MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS**
 20 **(First Request)**

21 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule 6-1 of this
 22 Court’s Local Rules, the United States moves for an extension of thirty days, from February
 23 19, 2016 to March 21, 2016, to file dispositive motions. There has not been a previous request
 24 for an extension of such deadline, although there was a previous, more general extension of the
 25 discovery schedule and pretrial deadlines, *see* order (ECF No. 13).

1 In support of this motion, the United States relies on the Memorandum of Points and
2 Authorities below.

3 Respectfully submitted this 28th day of January 2016.

4 DANIEL G. BOGDEN
5 United States Attorney

6 /s/ Patrick A. Rose
7 PATRICK A. ROSE
8 Assistant United States Attorney
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1 allow a party to request
3 additional time to perform an act. In this case, the United States respectfully requests this
4 extension for the reasons set forth below.

5 Undersigned defense counsel is currently preparing for a trial in the matter of *Kornberg*
6 *v. United States of America*, 2:12-cv-01961-JAD-PAL. The *Kornberg* case was reassigned to
7 undersigned defense counsel in connection with the departure of an AUSA at the end of
8 November 2015. Trial dates are scheduled for February 2, 3 and 10, 2016. With the *Kornberg*
9 trial and other duties, undersigned defense counsel will not have time to prepare dispositive
10 motions in the instant *Thomas* case by the current deadline of February 19, 2016.

11 This motion is brought in good faith and not for purposes of undue delay or unfair
12 prejudice to Plaintiff.

13 For the reasons above, the United States respectfully requests an extension of time, from
14 February 19, 2016 to March 21, 2016, to file dispositive motions.

15 Respectfully submitted this 28th day of January 2016.

16 DANIEL G. BOGDEN
17 United States Attorney

18 /s/ Patrick A. Rose
19 PATRICK A. ROSE
20 Assistant United States Attorney

21 **IT IS SO ORDERED:**

22 
23 _____
24 United States Magistrate Judge

25 **DATED:** January 29, 2016
26 _____

1 **PROOF OF SERVICE**

2 I, Patrick A. Rose, AUSA, certify that the following individuals were served with the
3 **MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS** on this date
4 by the below identified method of service:

4 **Electronic Case Filing:**

5 Brian David Nettles briannettles@nettlelawfirm.com

6 Christian Morris christian@nettlelawfirm.com

7 *Attorneys for Plaintiff.*

8
9 Dated this 28th day of January 2016.

10 /s/ Patrick A. Rose
11 PATRICK A. ROSE
12 Assistant United States Attorney
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