

1 DANIEL G. BOGDEN  
 United States Attorney  
 2 District of Nevada  
 PATRICK A. ROSE  
 3 Assistant United States Attorney  
 Nevada Bar No. 5109  
 4 333 Las Vegas Boulevard South, Suite 5000  
 Las Vegas, Nevada 89101  
 5 Telephone: 702-388-6336  
 Facsimile: 702-388-6787  
 6 Email: patrick.rose@usdoj.gov  
*Attorneys for the United States.*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 PAMELA MCSWAIN,	)	
	)	
11 Plaintiff,	)	Case No: 2:15-cv-01321-GMN-GWF
	)	
12 v.	)	
	)	
13 UNITED STATES OF AMERICA,	)	
	)	
14 Defendant.	)	

15 **UNITED STATES' MOTION FOR EXTENSION OF TIME**  
 16 **(First Request)**

17 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule 6-1 of this Court's  
 18 Local Rules, the United States moves for an order providing the United States with a four-week  
 19 extension of time, from October 30, 2015 to November 27, 2015 to respond to the Complaint in this  
 20 matter. There have not been any previous requests for such an extension of time.

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

23 Dated: October 26, 2015.

24 DANIEL G. BOGDEN  
 United States Attorney

25 /s/ Patrick A. Rose  
 26 PATRICK A. ROSE  
 Assistant United States Attorney

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 additional  
3 time to perform an act. In this case, the United States' present request for additional time is warranted  
4 for the reasons set forth below.

5 Undersigned defense counsel has not yet received file materials from the client agency relative to  
6 this matter. Such file materials would be helpful, if not necessary, in responding to the allegations in the  
7 Complaint. Undersigned defense counsel will be on medical leave October 27–30, 2015. Agency  
8 counsel will be on leave November 2–6, 2015. Undersigned defense counsel is scheduled to participate  
9 in depositions in other matters on November 9, 11 (out of town), 20, 2015. Based on these  
10 circumstances, the United States requests an extension of time from October 30, 2015 to November 27,  
11 2015 to allow defense counsel time, upon his and agency counsel's return to their respective offices, to  
12 communicate, review relevant file materials, and prepare a response to the Complaint.

13 This motion is brought in good faith and not for purposes of undue delay.

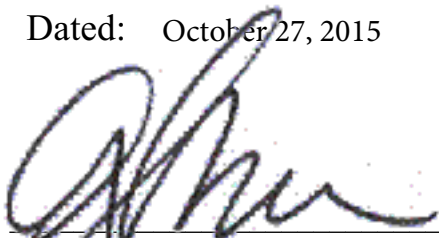
14 Respectfully submitted this 26th day of October 2015.

15 DANIEL G. BOGDEN  
16 United States Attorney

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

19 **IT IS SO ORDERED**

20 Dated: October 27, 2015

21   
22  
23  
24 Gloria M. Navarro, Chief Judge  
25 United States District Court  
26

