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

14 DONALD E. MITCHELL JR,
 15 Plaintiff,
 16 v.
 17 MIGUEL FLORES, *et al.*,
 18 Defendants.

Case No. 2:16-cv-00037-RFB-NJK

**DEFENDANT’S MOTION FOR
 EXTENSION OF TIME TO FILE
 STIPULATION AND PROPOSED
 ORDER OF DISMISSAL**

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 20 Defendant Miguel Flores-Nava, by and through counsel, Adam Paul Laxalt,
 21 Attorney General for the State of Nevada, and Jared M. Frost, Senior Deputy Attorney
 22 General, hereby requests an additional thirty (30) days to file a Stipulation and Proposed
 23 Order of Dismissal. Defendant’s Motion is made and based on Rule 6 of the Federal Rules
 24 of Civil Procedure, the following memorandum of points and authorities, the pleadings and
 25 papers on file, and any other evidence the Court deems appropriate to consider.

26 **MEMORANDUM OF POINTS AND AUTHORITIES**

27 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court may extend the
 28 time to perform an act within a specified time for good cause shown.

1 On October 10, 2018, the parties participated in a settlement conference at which a
2 settlement was reached to resolve this matter in its entirety. See ECF No. 92. At the
3 conclusion of the conference, the Court ordered the parties to file a stipulation and proposed
4 order for dismissal by November 7, 2018. *Id.*

5 On October 17, 2018, the undersigned mailed Plaintiff a proposed settlement
6 agreement and a proposed Stipulation and Order for Dismissal with Prejudice for his
7 review and signature. As of the date of this filing, the undersigned has not received a
8 response. Therefore, additional time is needed to communicate with Plaintiff in an effort to
9 determine the cause of the delay and to attempt to resolve any disagreements. For these
10 reasons, Defendants submit there is good cause to extend the time file the stipulation and
11 proposed order for an additional thirty (30) days, or until December 7, 2018.

12 DATED this 6th day of November, 2018.

13 ADAM PAUL LAXALT
14 Attorney General

15 By: /s/ Jared M. Frost
16 JARED M. FROST (Bar No. 11132)
17 Senior Deputy Attorney General

18 *Attorneys for Defendant*

19 **ORDER**

20 **IT IS SO ORDERED.** The parties shall have until December 7, 2018, to file a
21 stipulation and proposed order for dismissal.

22 DATED: November 7, 2018.

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26 NANCY J. KOPPE
27 UNITED STATES MAGISTRATE JUDGE
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