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7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 RUBEN P. PEREZ,

11 Petitioner,

12 vs.

13 BRIAN WILLIAMS, et al.,

14 Respondents.  
15

Case No. 2:16-cv-00830-RFB-GWF

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME  
TO FILE ANSWER TO AMENDED  
PETITION FOR WRIT OF HABEAS  
CORPUS (ECF NO. 12)**

**(FIRST REQUEST)**

16 Respondents move this Court for an enlargement of time of 45 days, up to and including  
17 December 28, 2017, in which to file their Answer to Petitioner's Amended Petition for Writ of Habeas  
18 Corpus (ECF No. 12). This Motion is made pursuant to FED.R.CIV.P. 6(b) and Rule 6-1 of the Local  
19 Rules of Practice and is based upon the attached affidavit of counsel.

20 This is the first enlargement of time sought by Respondents and is brought in good faith and not  
21 for the purpose of delay.

22 DATED November 9, 2017

23 Submitted by:

24 ADAM PAUL LAXALT  
Attorney General

25  
26 By: /s/ Natasha M. Gebrael  
NATASHA M. GEBRAEL (Bar. No. 14367)  
Deputy Attorney General  
27  
28

1 **DECLARATION OF NATASHA M. GEBRAEL**

2 STATE OF NEVADA )  
3 ) ss:  
4 COUNTY OF CLARK )

5 I, NATASHA M. GEBRAEL, being first duly sworn under oath, depose and state as follows:

6 1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am  
7 employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been  
8 assigned to represent Respondents in *Ruben Perez v. Brian Williams, et al.*, Case No. 2:16-cv-00830-  
9 RFB-GWF, and as such, have personal knowledge of the matters contained herein.

10 2. The Response to Petitioner’s Amended Petition for Writ of Habeas Corpus is due to be  
11 filed on November 13, 2017.

12 3. This Motion is made in good faith and not for the purpose of delay.

13 4. I have been unable with due diligence to timely complete a Response herein. I filed a  
14 Notice of Change of Attorney on October 24, 2017, which was my first appearance in the instant case.  
15 The attorney previously assigned to this matter, Dennis Wilson, is retiring from the Attorney General’s  
16 Office, necessitating a transfer of his active files, including this case. I am still in the process of reviewing  
17 the procedural history and relevant pleadings in the instant matter.

18 5. In addition to this case, I am responsible for approximately 40% of all state court habeas  
19 petitions that challenge time credits, with an average of 25-30 responses due per week. I am also  
20 responsible for certain non-time credit state petitions and direct appeals to the Nevada Supreme Court  
21 arising out of Attorney General prosecutions.

22 6. In addition to my overall workload, and the need to complete my review of this case file,  
23 the habeas unit at the Attorney General’s office will be short staffed until the end of November due to  
24 absences and vacation time and my workload is increasing to accommodate the absences.

25 7. I have spoken with the Assistant Federal Public Defender in this matter, Jeremy Baron,  
26 Esq. and he has indicated that the Public Defender has no objection to the 45-day extension of time.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing *UNOPPOSED MOTION FOR*  
3 *ENLARGEMENT OF TIME TO FILE ANSWER TO AMENDED PETITION FOR WRIT OF*  
4 *HABEAS CORPUS* with the Clerk of the Court by using the CM/ECF system on November 9, 2017.

5 The following participants in this case are registered CM/ECF users and will be served by the  
6 CM/ECF system:

7 Jeremy Baron, Esq.  
8 Federal Public Defender  
9 411 East Bonneville, Suite 250  
Las Vegas, NV 89101  
Jeremy\_Baron@fd.org

10  
11 /s/ M. Landreth  
An employee of the Office of the Attorney General