

1 ADAM PAUL LAXALT  
Attorney General  
2 Natasha M. Gebrael (Bar. No. 14367)  
Deputy Attorney General  
3 State of Nevada  
Office of the Attorney General  
4 555 E. Washington Ave., #3900  
Las Vegas, NV 89101  
5 (702) 486-2625 (phone)  
(702) 486-2377 (fax)  
6 NGebrael@ag.nv.gov  
Attorneys for Respondents  
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.

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

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
REPLY IN SUPPORT OF MOTION  
TO DISMISS (ECF NO. 26)**

**(FIRST REQUEST)**

15  
16 Respondents move this Court for an enlargement of time of 14 days, up to and including August  
17 31, 2018, in which to file their Reply to In Support of Motion to Dismiss (ECF No. 26). This Motion is  
18 made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the  
19 attached affidavit of counsel.

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

22 DATED August 16, 2018

23 Submitted by:

24 ADAM PAUL LAXALT  
Attorney General

25 By: /s/ Natasha M. Gebrael  
26 Natasha M. Gebrael (Bar. No. 14367)  
27 Deputy Attorney General  
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 Reply to Petitioner’s Response to Motion to Dismiss is due to be filed on August 17,  
11 2018.

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 Reply herein. In addition to  
14 this case and about 25% of all federal habeas corpus cases in Southern Nevada, I am responsible for  
15 approximately 25% of all state court habeas petitions that challenge time credits impacted by the Nevada  
16 Supreme Court’s recent decision in *Williams v. State of Nevada Dep’t of Corrections*, 402 P.3d 1260  
17 (Nev. 2017) including the responses to petitions, the hearings on each, and drafting the orders for such  
18 petitions. Recently, in addition to the 200 cases set for deadlines over the last 60 days, another 200 cases  
19 were set for deadlines in the next 60 days, with over 30-40 responses due per week. I am also responsible  
20 for certain non-time credit state petitions and direct appeals to the Nevada Supreme Court arising out of  
21 Attorney General prosecutions.

22 5. Moreover, I have firm pleading deadlines in various federal habeas cases including *Brass*  
23 *v. Williams*, 2:13-cv-02020-GMN-VCR (due on August 23, 2018). The focus on this matter has delayed  
24 me from timely filing a Reply In Support of Motion to Dismiss.

25 7. On August 15, 2018, I corresponded with Jeremy Baron, Esq., the federal public defender in this  
26 matter and as a matter of professional courtesy, Attorney Baron indicated that he has no objection to the  
27 extension of time. Attorney Baron’s lack of objection should not be considered as a waiver of any  
28 defenses, or construed as agreeing with the accuracy of the representations in this motion.

///



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of*  
3 *Time to File Reply in Support of Motion to Dismiss* with the Clerk of the Court by using the CM/ECF  
4 system on August 16, 2018.

5 The following participants in this case are registered electronic filing system users and will be  
6 served electronically:

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

12 /s/ M. Landreth  
13 An employee of the Office of the Attorney General