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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANNA GALAZA,) Case No. 2:16-CV-00878-RFB-CWH

Plaintiff,)

v.)

JEH CHARLES JOHNSON, Secretary,
Department of Homeland Security)

Defendant.)

**STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT TO FILE RESPONSE TO
MOTION FOR RECONSIDERATION (ECF
NO. 29)**

(First Extension Request)

COME NOW Plaintiff Anna Galaza (“Plaintiff”) and Defendant Jeh Charles Johnson, Secretary of the Department of Homeland Security (“Defendant”), and hereby stipulate and agree that Defendant may have up to and including Wednesday, January 25, 2017, to file his Response to Plaintiff’s Motion for Reconsideration. (ECF No. 29). Defendant’s response is currently due on January 20, 2017. An extension until January 25, 2017 is needed, however, because defense counsel has several filings due in other cases and an extension would allow her to complete all filings in a timely manner.

1 This is Defendant's first extension request. Plaintiff does not object to Defendant's extension
2 request. The parties aver that this extension request is made in good faith and not for the purpose of
3 delay.

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5 Dated: January 20, 2017.

6 DANIEL G. BOGDEN
7 United States Attorney


PHILIP J. TRENCHAK, ESQ.
Law Office of Philip J. Trenchak, Esq.

8 /s/ Holly A. Vance
9 HOLLY A. VANCE
10 Assistant United States Attorney

/s/ Philip J. Trenchak
PHILIP J. TRENCHAK
Counsel for Plaintiff, Galaza

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12 IT IS SO ORDERED:

13 Dated: January 23, 2017.

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15 RICHARD F. BOULWARE, II
16 United States District Court
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