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11 *Attorneys for Plaintiff Aprintess Williams*

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

14 APRINTESS WILLIAMS,
15 Mr. Williams,
16 v.
17 STATE OF NEVADA, DEPARTMENT
18 OF PAROLE & PROBATION,
19 MATTHEW KROOK, ERIC CHANDLER,
20 DOES 1 THROUGH 10; AND ROE
21 ENTITIES 1 THROUGH 10
22 Defendant(s).

Case No.: 2:16-CV-1283 JCM (VCF)

**MOTION TO EXTEND TIME TO
RESPOND TO MOTION FOR
SUMMARY JUDGMENT**
(First Request)

23 Plaintiff Aprintess Williams ("Mr. Williams"), by and through his undersigned counsel,
24 respectfully requests, pursuant to Local Rule IA 6-1 and Federal Rule of Civil Procedure 6(b), an
25 extension of time to respond to Defendants' State of Nevada, *et al.*, ("Defendants") Motion for
26 Summary Judgment ("Motion") (ECF No. 63) from July 31, 2018, to August 14, 2018. This is the
27 first request for an extension of time to respond to the Motion.

28 In addition to LR IA 6-1, FRCP 6(b) addresses extending time, stating in pertinent part,
"[w]hen an act may or must be done within a specified time, the court may, for good cause,
extend the time . . . if a request is made, before the original time or its extension expires."
Fed. R. Civ. P. 6(b)(A)(1). "Good cause is a non-rigorous standard that has been construed
broadly across procedural and statutory contexts." *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d
1253, 1259 (9th Cir. 2010). An application for extension of time under Rule 6(b) "should

1 normally be granted in the absence of bad faith on the part of the party seeking relief or prejudice
2 to the adverse party." *Id.* (quotations and citations omitted).

3 This extension is sought in good faith and is not requested for any improper purpose or
4 delay. Plaintiff's counsel, Brittanie T. Watkins, Esq., is currently out of the office on maternity
5 leave and other attorneys in the law firm for Plaintiff are providing assistance on this matter while
6 she is out. However, additional time is needed to fully respond to the Motion. Prior to filing this
7 motion, Plaintiff's counsel attempted to contact Defendants' counsel regarding this request, but
8 contact was unsuccessful as Defendants' counsel is out of the office with limited access to email
9 until August 6, 2018. Because attempts to contact Defendants' counsel were unsuccessful,
10 Plaintiff is unaware of Defendants' position on this request. However, the parties have previously
11 entered into various extensions to extend deadlines with no objection, and there is no prejudice to
12 Defendants in granting this request. Accordingly, Plaintiff respectfully requests this Court grant
13 the request for extension of time to respond to Defendants' Motion (ECF No. 63) from July 31,
14 2018, to August 14, 2018.

15 DATED this 30th day of July, 2018.

16 PISANELLI BICE PLLC

17 By: /s/Dustun H. Holmes

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Attorneys for Plaintiff Aprintess Williams

23 **IT IS SO ORDERED.**

24
25 
26 **UNITED STATES MAGISTRATE JUDGE**

27 **DATED:** 8-1-2018

