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5 Attorneys for Defendants
Sheriff Joseph Lombardo and
6 Bonnie Polley

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 ***

10 JIHAD MAJID AHAD,
11 Plaintiff,

12 vs.

13 BONNIE POLLEY; KITCHEN MANAGER,
JOHN DOE, SHERIFF LOMBARDO, LAS
14 VEGAS METROPOLITAN POLICE
DEPARTMENT DETENTION SERVICES
15 DIVISION, THE STATE OF NEVADA EX
REL,
16 Defendants.

CASE NO. 2:16-cv-1791-JCM-VCF

**MOTION TO EXTEND DISPOSITIVE
MOTIONS DEADLINE**

(FIRST REQUEST)

18 Defendants Sheriff Joseph Lombardo and Bonnie Polley, by and through their attorneys,
19 Robert W. Freeman, Esq of LEWIS BRISBOIS BISGAARD & SMITH, respectfully request this
20 Court to issue an Order extending the deadlines to file dispositive motions in this case.

21 **MEMORANDUM IN SUPPORT**

22 Pursuant to Local Rules (LR) 2604, LR6-1 and LR 26-1, Defendants, by and through their
23 attorneys, Lewis Brisbois Bisgaard & Smith LLP, hereby moves that this Court to extend the
24 deadline to file dispositive motions in the above-captioned case 45 days up to and including
25 Monday, July 23, 2018.

26 Local Rule (LR) 2604 provides that applications to extend any date set by the discovery
27 plan, scheduling order or other order must, in addition to satisfying the requirements of LR6-1, be
28 supported by showing of good cause for the extension.

1 LR26-1 also requires that an application for the extension of a deadline must be received
2 by the court no later than 21 days before extension of the subject deadline.

3 LR6-1 provides the “(a) request made after the expiration of the specified period shall not
4 be granted unless the moving party, attorney or other person demonstrates the failure to act as a
5 result of excusable neglect.”

6 In addition Defendants request that the pretrial motion deadline be extended for an
7 additional 45 days as outlined herein. In support of this Motion Defendants state as follows:

8 Discovery is closed in this matter.

9 This Request for an extension of time is not sought for any improper purpose or other
10 purpose of delay. This request for extension is based upon the following:

11 Defendants served Plaintiff with Interrogatories and Request for Production of Documents
12 on November 29, 2017. Plaintiff has provided no responses to any of the Interrogatories or
13 Request for Production of Documents despite a letter from Defendant’s discussing the situation.
14 Defendants filed a Motion to Compel Plaintiff’s Discovery Responses (ECF No. 27). On May 16,
15 2018, the Court filed its Order Granting Defendants’ Motion to Compel Plaintiff’s Discovery
16 Responses and further ordered that Plaintiff has until June 20, 2018 to respond to Defendants’
17 discovery requests. (ECF 28).

18 The current deadline to file dispositive Motions is June 6, 2018, fourteen days before
19 Plaintiff’s discovery responses are due. For this reason Defendants’ request additional time for the
20 parties to file their dispositive motions.

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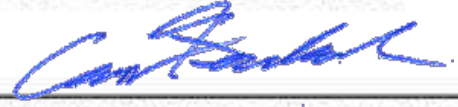
WHEREFORE, Defendants respectfully request that this Court extend the time for the parties to file their dispositive motions by thirty (45) days from the current deadline of June 6, 2018 up to and including July 23, 2018.

DATED this 24th day of May, 2018.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Robert W. Freeman
Robert W. Freeman, Esq.
Nevada Bar No. 3062
6385 S. Rainbow Blvd, Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 5-25-2018

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of May, 2018, I electronically filed the **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE** with the Clerk of the Court through the Case Management/Electronic Filing System.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 24th day of May, 2018, I served a true and correct copy of the foregoing **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE** by depositing a copy of same in the United States Mail at Las Vegas, Nevada postage fully prepaid, addressed to:

Jihad Majid Ahad
#1165705
CoreCivic/Saguaro Correctional Center
1252 East Arica Road
Eloy, Arizona 85121
Plaintiff in Proper Person

/s/ Kristen Freeman
Employee of LEWIS BRISBOIS
BISGAARD & SMITH LLP