

1 STEVEN W. MYHRE
Acting United States Attorney
2 District of Nevada

3 PATRICK A. ROSE
Nevada Bar No. 5109
4 Assistant United States Attorney
501 Las Vegas Boulevard, South, Suite 1100
5 Las Vegas, Nevada 89101
6 Phone: 702-388-6336
patrick.rose@usdoj.gov

7 *Attorneys for the United States*

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 ROMULO ANTONIO PORTILLO,)	Case No: 2:17-cv-00394-JAD-CWH
)	
12 Plaintiff,)	
)	
13 v.)	MOTION FOR EXTENSION OF TIME
)	(First Request)
14 UNITED STATES OF AMERICA,)	
)	
15 Defendant.)	

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17 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule 6-1 of this
18 Court’s Local Rules, the United States moves for an order providing the United States with a
19 fourteen (14) day extension of time, from May 12, 2017 to May 26, 2017, in which to respond
20 to the Complaint in this matter. There have not been any previous requests for such an extension
21 of time.

22 In support of this motion, the United States relies on the Memorandum of Points and
23 Authorities below.

24 Dated: May 11, 2017.

25 DANIEL G. BOGDEN
United States Attorney

26
27 /s/ Patrick A. Rose
PATRICK A. ROSE
Assistant United States Attorney

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1 allow a party to request
3 additional time to perform an act. In this case, the United States requests additional time to file a
4 response to the complaint for the reasons set forth below.

5 Undersigned defense counsel has been, and is currently, out of the office on unexpected
6 leave for a sick child and unable to dedicate the time necessary to complete a response to the
7 complaint. Counsel will also be out of the office one day next week.

8 Based on these circumstances, the United States requests an extension of time from May
9 12, 2017 to May 26, 2017, to file a response to the Complaint.

10 This motion is brought in good faith and not for purposes of undue delay.

11 Respectfully submitted this 11th day of May 2017.

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Patrick A. Rose
15 PATRICK A. ROSE
16 Assistant United States Attorney

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18
19 IT IS SO ORDERED:

20 
21 _____
22 UNITED STATES DISTRICT JUDGE
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: May 15, 2017

PROOF OF SERVICE

I, Patrick A. Rose, certify that the **MOTION FOR EXTENSION OF TIME** was served this date via the Court's Electronic Case Filing system.

Dated this 11th day of May 2017.

/s/ Patrick A. Rose
PATRICK A. ROSE
Assistant United States Attorney

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