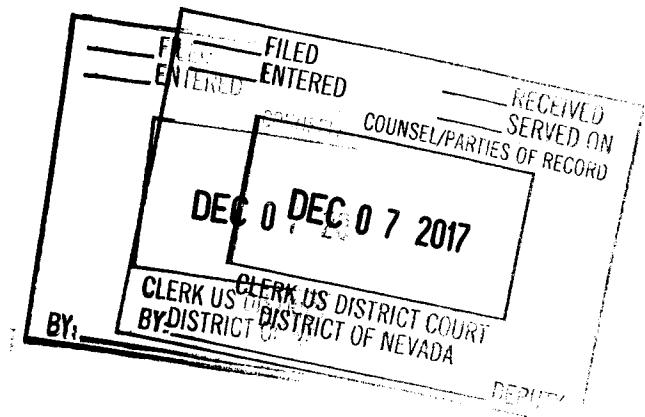


1 MICHAEL FOLEY  
2 209 S. Stephanie St. Ste. B-191  
3 Henderson, NV 89012  
4 Telephone: (702) 771-9725  
5 Plaintiff Pro Se



7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

11 MICHAEL FOLEY, ) Case No. 2:17-cv-01024-JCM-VCF  
12 )  
13 Plaintiff, )  
14 vs. )  
15 )  
16 Sylvia Teuton, an individual; James )  
17 Harris, an individual; Kenneth Bourne, an )  
18 individual; Joseph Lombardo, an )  
19 individual; Steven Wolfson, an individual; )  
20 Steven Grierson, Court Clerk; Clark )  
21 County Detention Center; Clark County, a )  
22 political subdivision of the State of )  
23 Nevada; Patricia Foley, an individual; )  
24 DOES 1-100 and ROES 101-200, )  
25 )  
26 Defendants. )

**UNOPPOSED MOTION TO EXTEND  
TIME TO FILE RESPONSE TO  
DEFENDANT CLARK COUNTY'S AND  
STEVEN WOLFSON'S MOTION TO  
DISMISS**

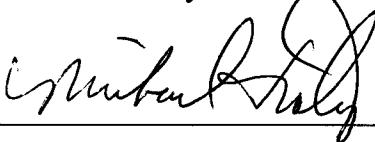
22 COMES NOW, Plaintiff Michael Foley, and hereby moves the Court to extend the  
23 time to respond to Defendants Clark County's and Steven Wolfson's MOTION TO  
24 DISMISS. This motion is filed unopposed.

25 On or about October 24, 2017, Defendants Clark County and Steven Wolfson filed  
26 their MOTION TO DISMISS the Plaintiff's complaint. The Plaintiff did not receive the  
27 motion until December 1st, 2017, when counsel for the defendants delivered it via  
28 electronic mail. Counsel for the defendants states that the motion was mailed, but the

1 Plaintiff has yet to receive it via postal mail. Counsel for the defendant has agreed to not  
2 oppose this motion. See the email correspondence, Exhibit "1."

3 Therefore, the Plaintiff respectfully requests that the Court extend the deadline for  
4 filing the response to December 15, 2017.

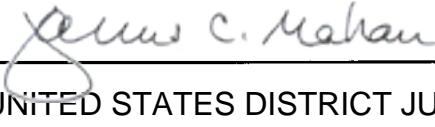
5 DATED this 4<sup>th</sup> day of December, 2017.

6 By: 

7  
8 Michael Foley  
9 209 S. Stephanie St. Ste. B-191  
Henderson, Nevada 89012

10 **ORDER**

11 IT IS SO ORDERED:

12   
13 UNITED STATES DISTRICT JUDGE

14 December 7, 2017

15 DATED: \_\_\_\_\_

17 **CERTIFICATE OF SERVICE**

18 The undersigned hereby certifies that the foregoing UNOPPOSED MOTION TO  
19 EXTEND TIME TO FILE RESPONSE TO DEFENDANT CLARK COUNTY'S AND  
20 STEVEN WOLFSON'S MOTION TO DISMISS was served by first class mail on  
21 December 4, 2017 to the following:

22 Lucinda Coumou, Deputy District Attorney  
23 500 Grand Central Parkway  
P.O. Box 552215  
24 Las Vegas, Nevada 89155-2215  
Attorney for Defendants Kenneth Bourne  
and James Harris

25 Steven G. Shevorski, Amanda C. Sage,  
Deputies Attorney General  
555 E. Washington Ave. Ste. 3900  
26 Las Vegas, Nevada 89101  
Attorney for Defendants Sylvia Teuton and  
27 Steven Grierson

28 SIGNED,



MICHAEL FOLEY, Plaintiff Pro Se

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## **Exhibit “1”**

## Re: Foley v. Teuton

LC Lucinda Coumou <Lucinda.Coumou@clarkcountyda.com>

Reply |

Fri 12/1, 6:01 PM

You

You replied on 12/1/2017 6:02 PM.

Mr. Foley - Remember, professional courtesies such as extensions of time are extended to, and for the benefit of, counsel preparing the document.

Lucinda Coumou

Sent from my iPhone

On Dec 1, 2017, at 5:07 PM, Michael Foley <[foley1769@LIVE.COM](mailto:foley1769@LIVE.COM)> wrote:

Thank you.

Don't forget, I DID grant an extension to Mr. Wolfson and Clark County. If Harris and Bourne would have handled YOU as they mishandled me, you'd also be less inclined to cut them any slack. May you NEVER experience an unjust divorce or debt like I have.

Best regards,

Michael Foley

---

**From:** Lucinda Coumou <[Lucinda.Coumou@clarkcountyda.com](mailto:Lucinda.Coumou@clarkcountyda.com)>

**Sent:** Friday, December 1, 2017 5:02 PM

**To:** Michael Foley

**Subject:** Re: Foley v. Teuton

Mr. Foley:

We did mail you a copy of the Motion. May I remind you that you refused to grant me an extension of time to respond to your complaint against Kenneth Bourne and James Harris. I will, however, extend you the courtesy of agreeing to the extension. My secretary will email you a copy of the Motion now. You can have 14 days from today to file an Opposition.

Lucinda Coumou

Sent from my iPhone

On Dec 1, 2017, at 4:53 PM, Michael Foley <[foley1769@LIVE.COM](mailto:foley1769@LIVE.COM)> wrote:

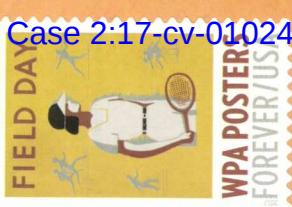
Thank you.

Did you overlook my request for an extension to Clark County's and Steven Wolfson's motion to dismiss? I have NOT received it in the mail. Perhaps you thought I'd get it electronically. I saw that it was filed on the docket at the clerk's office a few days ago when I filed the response to Grierson's MTD.

Also, would you mind emailing it to me? We can stipulate that the 14 days begin from when you send it electronically. If you don't respond today then we can address it during our conference on Monday.

Thanks again.

Sincerely,



Michael Foley  
209 S. Stephanie St. Ste. B-191  
Henderson, Nevada 89012

U.S. District Court  
333 S. Las Vegas Blvd.  
Las Vegas, Nevada 89101