

1 ADAM PAUL LAXALT
 Attorney General
 2 DOMINIKA J. BATTEN
 Deputy Attorney General
 3 Nevada Bar No. 12258
 4 KEVIN A. PICK
 Deputy Attorney General
 5 Nevada Bar No. 11683
 6 State of Nevada
 Office of the Attorney General
 7 5420 Kietzke Lane, Suite 202
 Reno, NV 89511
 8 (775) 687-2103 (phone)
 9 (775) 688-1100 (fax)
 Email: dbatten@ag.nv.gov
 10 kpick@ag.nv.gov
 Attorneys for Defendant
 11

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

14 CHRISTINE COSIO,
 15 Plaintiff,
 16 vs.
 17 STATE OF NEVADA ex rel. NEVADA
 DEPARTMENT OF TRANSPORTATION,
 18 a political subdivision of the State of Nevada;
 DOES I through V, inclusive; and ROES
 19 corporations I through V, inclusive,
 20 Defendants.
 21

Case No. 2:17-cv-01940-JAD-PAL

**MOTION TO EXTEND DEADLINE
 FOR DISPOSITIVE MOTIONS**
**(FIRST REQUEST TO EXTEND
 DEADLINE FOR DISPOSITIVE
 MOTIONS, SECOND REQUEST TO
 EXTEND DEADLINES IN
 STIPULATED DISCOVERY PLAN
 AND SCHEDULING ORDER)**

23 Defendant, STATE OF NEVADA ex rel. NEVADA DEPARTMENT OF
 24 TRANSPORTATION (“NDOT”), by and through its legal counsel, ADAM PAUL LAXALT,
 25 Attorney General, DOMINIKA J. BATTEN, Deputy Attorney General, and KEVIN A. PICK,
 26 Deputy Attorney General, hereby submit this Motion to Extend the May 7, 2018, Deadline for
 27 Dispositive Motions, pursuant to Local Rules IA 6-1, IA 6-2, and 26-4.

28 * * *

1 This is the Defendant's first request to extend the deadline for dispositive motions and
2 the second request to extend deadlines set forth in the Stipulated Discovery Plan and Scheduling
3 Order, the first such request having been by stipulation between the parties. See ECF No. 21.

4 On October 10, 2017, this Court entered an Order granting the Discovery Plan and
5 Scheduling Order submitted by the parties. See ECF No. 12. The parties then filed a stipulated
6 request to amend the Court's Scheduling Order and specifically requested a sixty (60) day
7 extension to the discovery deadline. See ECF No. 20. The stipulated extension of the discovery
8 deadline was granted by the Court and the deadline for dispositive motions was necessarily
9 extended as well.

10 The Defendant now requests a **three (3) week extension** of the deadline for dispositive
11 motions, which is currently set to expire on May 7, 2018. Good cause exists to grant this
12 requested extension due a death in the immediately family of Deputy Attorney General,
13 Dominika J. Batten, who is the primary/handling attorney assigned to this case. This request for
14 an extension of time is made in good faith, and not for the purpose of undue delay. If granted,
15 the new deadline for dispositive motions would be May 29, 2018 (May 28, 2018, is a Federal
16 holiday). Based on the foregoing, the Defendant respectfully requests that the deadline for
17 dispositive motions be extended an additional three (3) weeks.

18 DATED: April 26, 2018


19 ADAM PAUL LAXALT
20 Attorney General

21 By: /s/ Kevin A. Pick
22 KEVIN A. PICK, ESQ.
23 Deputy Attorney General
24 Nevada Bar No. 11683
25 Attorneys for Defendants

26 **ORDER**

27 IT IS SO ORDERED.

28 Dated: _____ May 8 __, 2018


U.S. Magistrate Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), the undersigned hereby certifies that she is an employee of the State of Nevada Office of the Attorney General and is a person of such age and discretion as to be competent to serve papers. That on this date, the undersigned filed a true and accurate copy of the foregoing **MOTION TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS** with the United States District Court, using the CM/ECF Electronic Filing, which will e-serve the following parties electronically:

Andrew L. Rempfer
10091 Park Run Drive, Suite 200
Las Vegas, NV 89145-8868
Andrew@rmllegal.com
Attorney for Plaintiff

Dated this 26th day of April, 2018.

/s/ Ginny Brownell
Ginny Brownell, an employee of
the office of the Nevada Attorney General