

1 RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

2 CHARLES M. DUFFY  
3 Trial Attorney, Tax Division  
4 U.S. Department of Justice  
5 P.O. Box 683  
6 Ben Franklin Station  
7 Washington, D.C. 20044-0683  
8 Telephone: (202) 307-6406  
9 Facsimile: (202) 307-0054  
10 [charles.m.duffy@usdoj.gov](mailto:charles.m.duffy@usdoj.gov)

11 DAYLE ELIESON  
12 United States Attorney  
13 *Of Counsel*

14 *Attorneys for the United States of America*

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 UNITED STATES OF AMERICA,	)	
	)	Case No. 2:17-cv-02854-APG-GWF
18 Plaintiff,	)	
	)	UNITED STATES' MOTION TO
19 v.	)	EXTEND THE DISCOVERY CUT-OFF
	)	DATE BY NINETY (90) DAYS
20 RAYMOND W. CRIHFIELD; LISA A.	)	
21 CRIHFIELD; AMBER L. CRIHFIELD; and	)	
22 DISCOVER BANK	)	
	)	
23 Defendants.	)	
_____	)	

24 The Plaintiff, United States of America ("United States"), by and through its undersigned counsel, hereby moves to extend the discovery cut-off date in this case until ninety (90) days after the Court enters an order on the Government's motion for summary judgment that was filed on October 22, 2018. *See* ECF #17. The discovery cut-off date is currently December 17, 2018. *See* ECF #13, at 2.

1           The Government’s motion for summary judgment would resolve this case if it is granted.  
2 But if the Court denies the referenced motion for summary judgment, the Government would  
3 like the opportunity to complete discovery on any issues that are not resolved by the Court’s  
4 Order on the motion. The requested 90 day extension would assist in reducing litigation costs  
5 and it would also enable the undersigned Government attorney – who is located in Washington  
6 D.C. – to better plan, and travel to, the depositions of the individual defendants (who live in two  
7 different states) if the motion for summary judgment is denied.

8           The undersigned counsel spoke to Defendant Raymond W. Crihfield by telephone on  
9 November 6, 2018 and Mr. Crihfield represented that he and his wife (Defendant Lisa A.  
10 Crihfield) do *not* oppose this motion. The undersigned also contacted Defendant Amber  
11 Crihfield, who said she would consider the extension. However, Amber Crihfield has not yet  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 stated whether or not she is in agreement with it. It appears that there would be no prejudice to  
2 any party if the Court grants this motion for an extension of the discovery deadline.

3 Dated: November 7th, 2018

4 RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

5  
6 /s/ Charles M. Duffy  
CHARLES M. DUFFY  
7 Trial Attorney, Tax Division  
U.S. Department of Justice

8 DAYLE ELIESON  
9 United States Attorney  
*Of Counsel*

10 Attorneys for the United States of America

11  
12  
13 IT IS SO ORDERED:

14   
15 \_\_\_\_\_  
16 UNITED STATES MAGISTRATE JUDGE

17  
18 DATED: 11-13-2018