

1 SIEGMUND F. FUCHS
 Trial Attorney, Torts Branch
 2 D.C. Bar No. 986828
 U.S. Department of Justice
 3 Ben Franklin Station
 P.O. Box 7146
 4 Washington, D.C. 20044-7146
 Telephone: (202) 616-4322
 5 Facsimile: (202) 616-4314
 Email: siegmund.f.fuchs@usdoj.gov

6 *Attorney for Defendants*

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

10 GHASSAN HOUBOUS BOUARI,)
)
 Plaintiff,)
 11 v.)
)
 12 FBI SA CHARLES RO; FBI SA DENNIS)
 LAO,)
)
 Defendants.)
 14)

Case No: 2:18-cv-00219-JCM-PAL

**STIPULATION TO EXTEND
 TIME TO RESPOND TO THE FIRST
 AMENDED COMPLAINT
 (First Request)**

15 Pursuant to Local Rule IA 6-1, the parties hereby stipulate to an extension of time for
 16 the Defendants to respond to the First Amended Complaint filed on December 29, 2020. (ECF
 17 31). This is the first request respecting the subject deadline.

18 The current deadline to respond to the First Amended Complaint is January 12, 2021. *See*
 19 *Fed. R. Civ. P. 12(a)(4)*. The parties had previously consulted on the original complaint in an
 20 attempt to limit the issues, claims, and parties before the Court, resulting in the First Amended
 21 Complaint. Plaintiff intends to file a separate, but related action against the United States in the
 22 coming weeks and to file a notice of related cases. The parties are currently consulting on that
 23 separate complaint to again limit the issues and claims before the Court. This request for an
 24 extension is for the purpose of allowing the parties to continue to meet and confer and to allow
 25 for the briefing on any motions to dismiss in both actions to follow the same schedule.

26 Accordingly, the parties respectfully request that the Defendants' response to the First
 27 Amended Complaint, currently due by January 12, 2021, be extended until **February 15, 2021**.
 28 This stipulation is not sought for purposes of delay or any other improper purpose.

Respectfully submitted this 31st day of December 2020.

<p><i>/s/ Eugene Iredale</i> <u>EUGENE IREDALE</u> Iredale and Yoo, APC 105 West F Street, Fourth Floor San Diego, California 92101 (619) 233-1525 egiredale@iredalelaw.com</p> <p><i>/s/ Benjamin Durham</i> <u>BENJAMIN DURHAM</u> Nevada Bar No. 7684 601 South 10th Street, Suite 101 Las Vegas, Nevada 89101 (702) 631-6111 bdurham@vegasdefense.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p>JEFFREY BOSSERT CLARK Acting Assistant Attorney General Civil Division</p> <p>C. SALVATORE D’ALESSIO, JR. Acting Director Torts Branch, Civil Division</p> <p>ANDREA W. MCCARTHY Senior Trial Counsel Torts Branch, Civil Division</p> <p><i>/s/ Siegmund F. Fuchs</i> <u>SIEGMUND F. FUCHS</u> Trial Attorney, Torts Branch D.C. Bar No. 986828 U.S. Department of Justice Ben Franklin Station P.O. Box 7146 Washington, D.C. 20044-7146 (202) 616-4322 siegmund.f.fuchs@usdoj.gov</p> <p><i>Attorneys for Defendants</i></p>
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ORDER

IT IS SO ORDERED

DATED: 12:44 pm, January 06, 2021

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE