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 8 \*Attorney for Petitioner Victor Torres-Mejia

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 10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

12 Victor Torres-Mejia,  
 13 Petitioner,  
 14 v.  
 15 Jerry Howell, *et al.*,  
 16 Respondents.

Case No. 2:18-cv-00681-RFB-VCF  
**Unopposed Motion for Extension  
 of Time to File Reply to  
 Respondents' Answer (ECF No. 38)**  
**(First Request)**

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1 **POINTS AND AUTHORITIES**

2 Petitioner Victor Torres-Mejia respectfully asks this Court to enter an Order  
3 extending his deadline of December 10, 2020 for filing his Reply to Respondents'  
4 Answer by 31 days, or until January 11, 2021. Respondents do not oppose this  
5 request. This is Torres-Mejia's first request for an extension.

6 Although undersigned counsel has been diligently working on Torres-Mejia's  
7 reply, counsel has other filing deadlines around the same time. In addition, counsel  
8 has yet to be able to contact Torres-Mejia to discuss this Reply with him. An extension  
9 of time to file the reply is necessary given the complexity of Torres-Mejia's case and  
10 counsel's other obligations.

11 This is Torres-Mejia's first request for an extension on his reply.

12 On November 30, 2020, counsel for Respondents, Deputy Attorney General  
13 Gerri Hardcastle, indicated by email that Respondents do not oppose this request  
14 with the understanding that the lack of objection is not waiver of any procedural  
15 defenses or statute of limitations challenges or construed as agreeing with the  
16 accuracy of the representations made in this Motion.

17 Dated November 30, 2020.

18 Respectfully submitted,

19 Rene L. Valladares  
20 Federal Public Defender

21 /s/Ron Y. Sung  
22 RON Y. SUNG  
23 Assistant Federal Public Defender

24 IT IS SO ORDERED:

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26 RICHARD F. BOULWARE, II  
27 United States District Judge  
DATED this 30th day of November, 2020.