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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL ROBBINS,

Petitioner,

vs.

JERRY HOWELL, *et al.*,

Respondent(s).

Case No. 2:19-cv-02153-APG-VCF

**MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONSE TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 20)**

(FOURTH REQUEST)

Respondents move this Court for an enlargement of time of 30 days from the current due date of January 4, 2021, up to and including February 3, 2021, in which to file their Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20). This Motion is made pursuant to Fed. R.Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the fourth enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: January 4, 2021.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIME STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIME STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Daniel Robbins v. Jerry Howell, et al.*, Case No. 2:19-cv-02153-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This is my fourth request for an extension to file the Response to Petitioner's First Amended Petition for Writ of Habeas Corpus (ECF No. 20), and the instant Motion is made in good faith and not for the purpose of delay.

3. The Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20) is currently due on January 4, 2021.

4. I am unable with due diligence to timely complete the Response herein. My office is still contending with the technological difficulties and issues ensuing from the COVID-19 pandemic, including still working from home as a result of the significant number of cases which are now once more on the rise again. Additionally, I am still attempting to manage severe on-going medical issues. Between these issues and the intervening holidays over the past several weeks, I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Response in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. Based on the foregoing, I respectfully request an enlargement of time of 30 days, up to and including February 3, 2021, to file the Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20).

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1 I declare under penalty of perjury that the foregoing is true and correct.
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4 Executed on this 4th day of January, 2021.
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/s/ Jaimie Stilz
Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

IT IS SO ORDERED:

Dated: January 5, 2021


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ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 4th day of January, 2021, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS (ECF NO. 20)**, by U.S. District Court CM/ECF electronic filing, to:

Lisa A. Rasmussen, Esq.
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/s/ *Jaimie Stilz*
An employee of the Office of the Attorney General