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District of Nevada
Nevada Bar Number 13644

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Aracely Pacheco Moran,

Plaintiff,

v.

CHAD WOLF, Acting Secretary of
Homeland Security; MATTHEW T.
ALBENCE, Deputy Director and Senior
Official Performing the Duties of the
Director for U.S. Immigration and
Customs Enforcement; KENNETH T.
CUCCINELLI, Senior Official Performing
the Duties of the Director, U.S. Citizenship
and Immigration Services; Sandra
Anderson, Department of Homeland
Security, Office of Chief Counsel; MAYA
S. TIMIS; NICOLE WELLS, OFFICER
ZHOU, OFFICER CANTRELL,
UNKNOWN DOES DEFENDANTS 1-99,

Defendants.

Case No. 2:20-cv-01292-KJD-VCF

**Stipulation and Order for Extension
of Time**

(First Request)

Defendants Chad Wolf, Acting Secretary of Homeland Security; Matthew T.
Albence, Deputy Director and Senior Official Performing the Duties of the Director for U.S.
Immigration and Customs Enforcement; Kenneth T. Cuccinelli, Senior Official Performing
the Duties of the Director, U.S. Citizenship and Immigration Services; Sandra Anderson,

1 Department of Homeland Security, Office of Chief Counsel; Maya S. Timis; Nicole Wells¹;
 2 “Officer Zhou”; and “Officer Cantrell” (Defendants”) and Plaintiff Aracely Pacheco Moran
 3 (“Plaintiff”) hereby stipulate and agree that Defendants may have a 30-day extension of
 4 time, from December 31, 2020 to February 1, 2021, to reply to Plaintiff’s Opposition to
 5 Defendants’ Motion to Dismiss Plaintiff’s. (ECF No. 26). This motion is brought pursuant
 6 to Federal Rule of Civil Procedure 6(b)(1)(A).

7 An extension is warranted because defense counsel’s office is currently short-staffed,
 8 and the limited staff that is available works part-time from home where computer
 9 connectivity issues are prevalent. The office also has been inundated with emergency
 10 COVID-19-related motions, and defense counsel is assisting with responding to that
 11 litigation. The deadlines in those cases are usually shortened and require prompt action. As
 12 a result, defense counsel has had less time to devote to her regularly-assigned cases. Lastly,
 13 defense counsel’s daughter and son-in-law, who are nurses, recently contracted COVID-19
 14 following an outbreak at the hospital where they work. They in turn passed the virus on to
 15 their 17-month old daughter. Defense counsel has taken time off to assist with their
 16 recovery, including running errands, grocery shopping, etc. Under the circumstances, good
 17 cause exists to extend the time for Defendants to respond to Plaintiff’s Opposition to
 18 Defendants’ Motion to Dismiss. *See* Fed. R. Civ. P. 6(b)(1)(A) (“When an act may or must
 19 be done within a specified time, the court may, *for good cause*, extend the time...with or
 20 without motion or notice if the court acts, or if a request is made, before the original time
 21 or its extension expires[.]”) (emphasis added).

22 This is Defendants’ first request for an extension of time. *See* LR IA 6-1(a) (must
 23 advise of previous extensions). Defense counsel contacted Plaintiff’s counsel regarding this

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26 ¹ The amended complaint identifies “Nichole Wells” (ECF No. 10 ¶ 12), but the correct
 27 spelling of her name is *Nicole* Wells.

1 extension request, and he has advised that he does not oppose the request. This stipulation
2 is made in good faith and not for the purpose of undue delay.

3 Respectfully submitted this 29th day of December 2020.

4 MILLENNIUM LEGAL LLC

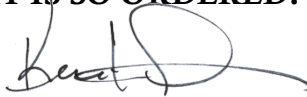
NICHOLAS A. TRUTANICH
United States Attorney

5
6 /s/ Brian J. Ramsey
BRIAN J. RAMSEY, ESQ.
7 *Attorney for Plaintiff*

/s/ Holly A. Vance
HOLLY A. VANCE
Assistant United States Attorney
8 *Attorneys for Defendants*

9 **DATED:** 1/8/2021

IT IS SO ORDERED:

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11 UNITED STATES DISTRICT JUDGE
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