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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

20 SANDOR ANIVAL CORDOVA
CARBALLO, et al.

Petitioners.

V.

WILLIAM BARR, et al.,

Respondents.

Case No. 2:20-cv-01315-APG-BNW

(Third Request)

26 Pursuant to LR IA 6-1(a) and LR 7-1(a), the parties, through their respective counsel,
27 stipulate and respectfully request that the Court extend the remaining briefing deadlines related to
28 the Federal Defendants' Motion to Strike Portions of Amended Complaint (Doc. 52) and Plaintiffs'

1 Amended Complaint (Doc. 51). This is the parties' third request to extend the deadlines for
2 Defendants' response to the Amended Complaint and the parties' Stipulated Discovery Plan, and
3 first request to extend the deadlines related to the Motion to Strike. If granted, the new deadlines
4 will be as follows:

5

- 6 • Plaintiff's Response to Motion to Strike: **December 2, 2020**
- 7 • Defendants' Reply in Support of Motion to Strike: **December 16, 2020**
- 8 • Defendants' response to Amended Complaint and the parties' Stipulated Discovery
9 Plan: **14 days after ruling on Motion to Strike**

10 On September 30, 2020, the Court granted Defendants' Motion to Dismiss in part and
11 dismissed all habeas corpus claims. (Doc. 46.) In that same order, the Court extended Plaintiffs'
12 deadline to amend the Complaint to October 9, 2020. (Id.)

13 On October 9, 2020, the parties stipulated to extend the deadline for Plaintiffs to file their
14 Amended Complaint, for Defendants to file their response to the Amended Complaint, and for the
15 parties to file their Stipulated Discovery Plan due to Plaintiffs' counsel's family health emergency.
16 (Doc. 47.) The Court granted the Stipulation that same day. (Doc. 48.)

17 On October 19, 2020, the parties stipulated to extend the deadline for Plaintiffs to file their
18 Amended Complaint, for Defendants to file their response to the Amended Complaint, and for the
19 parties to file their Stipulated Discovery Plan again due to Plaintiffs' counsel's continued family
20 health emergency. (Doc. 49.) The Court granted the Stipulation the next day, on October 20, 2020.
21 (Doc. 50.) As a result of the extension, Plaintiffs' Amended Complaint was due on or before
22 November 2, 2020; Defendants' response to the Complaint and the parties' Stipulated Discovery
23 Plan were due on or before November 20, 2020. (Id.)

24 On November 2, 2020, Plaintiffs filed their Amended Complaint. (Doc. 51.) Two days later,
25 on November 4, 2020, the Federal Defendants filed a Motion to Strike Portions of Amended
26 Complaint. (Doc. 52.) Plaintiffs' response to the Motion to Strike was due on November 18, 2020.
27 On that date, counsel agreed to seek the instant extensions of the deadlines for Plaintiffs' response
28 to the Motion to Strike, Defendants' reply in support of the Motion to Strike, Defendants' response

1 to the Amended Complaint, and the parties' Stipulated Discovery Plan.
2

3 Good cause exists to grant the extensions. First, Plaintiffs' counsel has continued to need to
4 dedicate time to her family health emergency. Second, continuing Defendants' deadline to respond
5 to the Amended Complaint until after the Court has ruled on the Motion to Strike will conserve the
6 parties' and the Court's resources by eliminating the need for the parties to brief the same issues
7 twice (e.g., in the Motion to Strike and in a Motion to Dismiss). For these reasons, the parties
8 respectfully request that the Court extend the deadlines as outlined above.

9 DATED this 18th day of November 2020.
10

11 STRUCK LOVE BOJANOWSKI & ACEDO, PLC
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IT IS SO ORDERED.

Dated this 19th day of November, 2020.


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Attorney for Petitioners
CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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