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13

14 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

15 Jacqueline Garcia,

16 Case No: 2:23-cv-00849-CDS-VCF

17 Plaintiff,

18 **Unopposed Motion for Extension of**  
**Time**

19 v.  
20 Eric S. Cohan, Stephanie Syptak-Ramnath,  
21 Antony Blinken,

22 **(Fourth Request)**

23 Defendants.

24 The Federal Defendants respectfully move for a 30-day extension of time, from  
25 November 20, 2023, to December 20, 2023, to file a response to Plaintiff's Complaint (ECF  
26 No. 1). This is the fourth request for an extension of time. Undersigned defense counsel has  
27 inquired with Plaintiff's counsel, who agrees with this request. Indeed, Plaintiff's counsel  
28 would like additional time to confer with his client.

29 **MEMORANDUM OF POINTS AND AUTHORITIES**

30 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to  
31 request additional time to perform an act. In this case, the Federal Defendants request  
32 additional time to file a response to the Complaint for the reasons set forth below.

33 Without admission or waiver by the parties, the parties continue to assess recent  
34 developments at the agency level. Plaintiff's counsel would like additional time to confer  
35 with his client. Defense counsel has a number of pressing matters in other cases including a

1 motion for summary judgment due on November 20, 2023, and an upcoming settlement  
2 conference for which settlement authority must be sought. Additionally, there is the  
3 prospect of a lapse of congressionally-funded appropriations on November 17, 2023.  
4 Lapses of appropriations negatively affect the availability of personnel at the USAO, client  
5 agencies, or both to conduct business.

6 This motion is filed in good faith and not for the purposes of undue delay.  
7 Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel consents to,  
8 this extension of time, from November 20, 2023, to December 20, 2023, to file a response  
9 to Plaintiff's Complaint.

10 Respectfully submitted this 14th day of November 2023.

11 JASON M. FRIERSON  
12 United States Attorney

13 /s/ Patrick A. Rose  
14 PATRICK A. ROSE  
15 Assistant United States Attorney

16 **IT IS SO ORDERED**

17   
18 **UNITED STATES MAGISTRATE JUDGE**  
19 **DATED:** 11-14-2023