

1 RENE L. VALLADARES
 Federal Public Defender
 2 Nevada State Bar No. 11479
 BENJAMIN F. J. NEMEC
 3 Assistant Federal Public Defender
 4 411 E. Bonneville, Ste. 250
 Las Vegas, Nevada 89101
 (702) 388-6577
 5 Ben_Nemec@fd.org

6 Attorney for Melissa Ann Heil

7
 8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
 11 Plaintiff,
 12 v.
 13 MELISSA ANN HEIL,
 14 Defendant.

Case No. 2:24-cv-01505-GMN-NJK

**Stipulation to Extend Deadline to File
 Opening Brief**
 (First Request)

15
 16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
 17 United States Attorney, and David C. Kielber, Assistant United States Attorney, counsel for the
 18 United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin F.
 19 J. Nemec, Assistant Federal Public Defender, counsel for Melissa Ann Heil, request that the
 20 due date for Ms. Heil’s Opening Brief, be extended by fourteen (14) days.

21 This Stipulation is entered into for the following reasons:

- 22 1. Defense counsel was recently informed that an out of jurisdiction case is going
- 23 forward in September. As a result, resources have been diverted to preparing that case for trial.
- 24 2. Defense counsel needs additional time to draft the Opening Brief.

25 DATED this 29th day of August, 2024.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Benjamin F. J. NemeC
BENJAMIN F. J. NEMEC
Assistant Federal Public Defender

By /s/ David C. Kiebler
DAVID C. KIEBLER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MELISSA ANN HEIL,

7 Defendant.
8

Case No. 2:24-cv-01505-GMN-NJK

ORDER

9
10 IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to
11 Extend the Deadline to file Opening Brief, that the Defendant's deadline to file Opening
12 Brief is extended from August 28, 2024 to September 12, 2024.

13 DATED this 29 day of August, 2024.

14
15 

16 _____
17 GLORIA M. NAVARRO
18 UNITED STATES DISTRICT JUDGE
19
20
21
22
23
24
25
26