Bynoe v. Helling et al

Doc. 100

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA) ss: COUNTY OF CLARK)

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I, JAIMIE 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 *Michael Bruce Bynoe v. Perry Russell, Warden, et al.*, Case No. 3:07-cv-00009-LRH-CLB, and as such, have personal knowledge of the matters contained herein.
- 2. This is my first request for an extension to file the Response to the Second Amended Petition (ECF No. 98), and this Motion is made in good faith and not for the purpose of delay.
 - 3. The Response to the Second Amended Petition is currently due on April 18, 2022.
- 4. I am unable with due diligence to timely complete the Response herein. I am still attempting to manage significant on-going personal/medical issues. 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. I have spoken to counsel for Bynoe, and he does not oppose this request.
- 7. Based on the foregoing, I respectfully request an enlargement of time of 60 days, up to and including June 17, 2022, to file the Response to the Second Amended Petition (ECF No. 98).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18th day of April, 2022.

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

25 III S SO ORDERED:

LARRY R. HICKS UNITED STATES

UNITED STATES DISTRICT JUDGE

Dated: May 12, 2022.

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