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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TERRY D. DIXON,
Petitioner,
vs.
RENEE BAKER, et al.,
Respondents.

Case No. 3:13-cv-00248-RJC-CSD

**ORDER GRANTING UNOPPOSED
MOTION FOR ENLARGEMENT OF
TIME TO FILE RESPONSE TO
MOTION FOR EVIDENTIARY
HEARING
(ECF NO. 90)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 14 days from the current due date of February 25, 2022, up to and including March 11, 2022, in which to file their response to the motion for evidentiary hearing (ECF No. 90). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents to file the response, and the request is brought in good faith and not for the purpose of delay.

DATED February 25, 2022

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jessica Perlick
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General

DECLARATION OF JESSICA PERLICK

1
2 STATE OF NEVADA)
3 COUNTY OF CLARK) ss:

4 I, JESSICA PERLICK, being first duly sworn under oath, deposes and states as follows:

5 1. I am an attorney licensed to practice law in all courts within the State of Nevada and am
6 employed as a Senior Deputy Attorney General in the Office of the Nevada Attorney General. I have
7 been assigned to represent Respondents in *Terry D. Dixon v. Renee Baker, et al.*, Case No. 3:13-cv-
8 00248-RJC-CSD, and as such, have personal knowledge of the matters contained herein.

9 2. This motion is made in good faith and not for the purposes of delay.

10 3. The deadline to file the response to Dixon’s motion for evidentiary hearing (ECF No. 90)
11 is February 25, 2022.

12 4. I previously requested an extension for this response, as well as a reply in support of the
13 motion to dismiss Dixon’s amended petition, to account for already-existing deadlines including a reply
14 brief in *Murray v. Howell*, 21-15104, responses in *Shue v. Johnson*, 2:20-cv-02025; *Guevara-Pontifes v.*
15 *Baker*, 3:20-cv-00652; and *Palmer v. Gittere*, 3:18-cv-00245; and an answering brief in *Connors v.*
16 *Hutchings*, 21-15693; as well as the time needed to provide coverage during colleagues’ annual leave.

17 5. I have been unable with due diligence to complete the response herein. In my previous
18 request, I referenced the need to prioritize an answer in *Guy v. Baca*, 2:11-cv-01809, which is
19 unfortunately still in progress. In January I was dealing with a health issue that was impacting my work.
20 Although I have since recovered, I am still working to catch up on outstanding deadlines that were
21 impacted, including the answer in *Guy*.

22 6. Finally, in addition to working to catch up on everything impacted by the health issues in
23 January, last week I had oral argument in *Murray v. Howell*, 21-15104, so I also spent significant time
24 preparing for that.

25 7. I have communicated with counsel for Dixon regarding this request, and she indicated that
26 she does not object to this extension.

27 8. I am filing a separate request for additional time to file the reply in support of the motion
28 to dismiss (ECF No. 71), seeking the same 14-day extension.

