Hawthorne v	Bennington et al	Do
1 2 3 4 5	AARON D. FORD Attorney General ROST C. OLSEN, Bar No. 14410 Deputy Attorney General State of Nevada Public Safety Division 100 N. Carson Street Carson City, NV 89701-4717 Tel: (775) 684-1209 E-mail: rolsen@ag.nv.gov	
6	Attorneys for Defendants	
7	Mackenzie Bennington and Whitney Benni	ngton
8		
9	UNITED STAT	ES DISTRICT COURT
10	DISTRIC	CT OF NEVADA
11	ADAM HAWTHORNE,	Case No. 3:16-cv-00235-RCJ-CLB
12	Plaintiff,	DEFENDANTS' MOTION FOR
13	v.	EXTENSION OF TIME TO FILE REPLY
14	MACKENZIE BENNINGTON, et al.,	IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT (First Request)
15	Defendant.	

Defendants, Mackenzie Bennington and Whitney Bennington, by and through
counsel Aaron D. Ford, Attorney General of the State of Nevada, and Rost C. Olsen, Deputy
Attorney General, move this Court for a short 14-day extension of time to file a reply in
support of their Motion for Summary Judgment (ECF No. 101).

Federal Rule of Civil Procedure 6(b)(1)(A) permits the Court to extend a deadline before its expiration, either upon a motion or *sua sponte*, upon a showing of good cause.

Here, the notice of electronic service accompanying Plaintiff's Opposition to the
Motion for Summary Judgment (ECF No. 113) indicates reply briefs are due April 22, 2021.
However, the Undersigned is in the midst of preparing for multi-day jury trial beginning
April 20, 2021, and anticipates it continuing until at least April 23, 2021. See, generally,
Decl. of Counsel.

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Doc. 115

1	Accordingly, Undersigned submits there is good cause for an extension, and
2	respectfully requests the reply brief deadline be extended until Thursday, May 6, 2021.
3	Defendants seek this extension in good faith and not to cause any undue delay or any other
4	improper purpose.
5	DATED this 12th day of April, 2021.
6	AARON D. FORD Attorney General
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8 9	By: ROST C. OLSEN, Bar No. 14410 Deputy Attorney General
10	Attorneys for Defendant
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12	IT IS SO ORDERED.
13	Dated: April 13, 2021
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15	UNITED STATES MAGISTRATE JUDGE
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1	CERTIFICATE OF SERVICE	
2	I certify that I am an employee of the Office of the Attorney General, State of	
3	Nevada, and that on this 12th day of April, 2021, I caused to be served a copy of the	
4	foregoing, DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE REPLY	
5	IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT (First Request), by U.S.	
6	District Court CM/CEF Electronic Filing on:	
7		
8		
9	Adam Hawthorne, #67761	
10	C/O NNCC Law Librarian Northern Nevada Correctional Center	
11	P.O. Box 7000 Carson City, NV 89702	
12	lawlibrary@doc.nv.gov	
13	Canakall	
14	An employee of the Office of the Attorney General	
15	Office of the Attorney General	
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EXHIBIT A

Declaration of Counsel

EXHIBIT A

1	AARON D. FORD		
2	Attorney General ROST C. OLSEN, Bar No. 14410 Deputy Attorney General State of Nevada		
3			
4	Public Safety Division 100 N. Carson Street		
5	Carson City, NV 89701-4717 Tel: (775) 684-1209		
6	E-mail: rolsen@ag.nv.gov		
7	Attorneys for Defendants Mackenzie Bennington and Whitney Bennington		
8			
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	ADAM HAWTHORNE, Case No. 3:16-cv-00235-RCJ-CLB		
12	Plaintiff,		
13	v. DECLARATION OF COUNSEL		
14	MACKENZIE BENNINGTON, et al.,		
15	Defendant.		
16	I, Rost C. Olsen, declare the following:		
17	1. I am an attorney licensed to practice in the State of Nevada, and am admitted		
18	to the bar of the United States District Court for the District of Nevada;		
19	2. I am employed as a Deputy Attorney General with the Office of the Nevada		
20	Attorney General, and am the counsel of record for the Defendants in the above-captioned		
21	matter;		
22	3. I am over the age of 18, and am otherwise fully competent to testify to the		
23	facts contained in this declaration;		
24	4. The statements contained in this declaration, except where otherwise		
25	indicated to be upon information and belief, are based on my personal knowledge;		
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1	5. I am preparing for a jury trial in a matter other than the one captioned above
2	beginning April 20, 2021, and I anticipate it continuing through at least April 23, 2021;
3	6. Accordingly, I seek a two week extension, until May 6, 2021, to prepare a
4	reply brief in support of the Motion for Summary Judgment filed in the above-captioned
5	matter;
6	7. This extension is sought in good faith, and not to cause an undue delay or for
7	any other improper purpose.
8	Pursuant to 28 U.S.C. § 1746, Declarant certifies, under penalty of perjury, that the
9	foregoing is true and correct.
10	Executed this 12th day of April, 2021 in Sparks, Nevada.
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12	<u>/s/ Rost C. Olsen</u> Rost C. Olsen
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