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8 *Candis Brockway, Sheryl Foster,*  
*Jonathan Perry, and Ashley Randolph*  
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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 CHRISTOPHER A. JONES,  
13 Plaintiff,

14 vs.

15 BRUCE BANNISTER, et al.,  
16 Defendants.

Case No. 3:16-cv-00399-MMD-VPC

**DEFENDANTS' MOTION FOR EXTENSION  
OF TIME TO SERVE DISCOVERY  
RESPONSES**

17 Defendants, Romeo Aranas, Isidro Baca, Candis Brockway, Sheryl Foster, Jonathan Perry, and  
18 Ashley Randolph (Defendants), by and through counsel, Adam Paul Laxalt, Attorney General of the  
19 State of Nevada, and Benjamin R. Johnson, Deputy Attorney General, hereby submit this Motion for  
20 Extension of Time to Serve Discovery Responses. This Motion is based on Federal Rule of Civil  
21 Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and  
22 pleadings on file in this action.

23 **MEMORANDUM OF POINTS AND AUTHORITIES**

24 **I. RELEVANT PROCEDURAL HISTORY**

25 On November 8, 2017, Plaintiff served discovery requests upon Defendants, including both  
26 interrogatories and requests for admission.

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1 **II. ARGUMENT**

2 Defendants respectfully request a fourteen (14) day extension of time to serve discovery  
3 responses. Counsel for Defendants is confronted with numerous competing deadlines and a high  
4 workload due to staffing changes in the Office of the Attorney General. Furthermore, defense counsel  
5 is currently in trial in another matter before this Court, *Cross v. Jaeger*, 3:13-cv-00433-MMD-WGC  
6 (*see* (ECF No. 518)). However, such obstacles are currently being resolved, trial in the other case is  
7 drawing to a conclusion, and the requested extension of time will afford Defendants adequate time to  
8 serve discovery responses in this matter.

9 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

10 When an act may or must be done within a specified time, the court may,  
11 for good cause, extend the time: (A) with or without motion or notice if  
12 the court acts, or if a request is made, before the original time or its  
13 extension expires; or (B) on motion made after the time has expired if the  
14 party failed to act because of excusable neglect.

15 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case,  
16 but will allow for thorough responses to Plaintiff's discovery requests. Defendants' request is made in  
17 good faith and not to delay or hinder proceedings in this matter. The requested fourteen (14) day  
18 extension of time will permit Defendants time to adequately research and respond to Plaintiff's  
19 discovery requests. Defendants assert that the requisite good cause is present to warrant the requested  
20 extension of time.

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1 **III. CONCLUSION**

2 For the foregoing reasons, Defendants respectfully request a fourteen (14) day extension of time  
3 to serve pending discovery responses, with a new deadline for service through Friday, December 22,  
4 2017.

5 DATED this 8th day of December, 2017.

6 ADAM PAUL LAXALT  
7 Attorney General

8 By: Benjamin R. Johnson  
9 BENJAMIN R. JOHNSON  
10 Deputy Attorney General  
11 State of Nevada  
12 Bureau of Litigation  
13 Public Safety Division  
14 *Attorneys for Defendants*

15 **IT IS SO ORDERED.**

16 Valerie T. Poole  
17 U.S. MAGISTRATE JUDGE

18 DATED: December 27, 2017


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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 8th day of December, 2017, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO SERVE DISCOVERY RESPONSES**, by U.S.

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An employee of the  
Office of the Attorney General