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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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7 *Attorneys for Defendants*  
*Adam Brendel, John "James" Buchanan,*  
8 *Timothy Howard and William Miller*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 THOMAS JENSEN,

12 Plaintiff,

13 v.

14 ADAM BRENDEL, et al.,

15 Defendants.

Case No. 3:16-cv-00407-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO  
FILE MOTION FOR SUMMARY  
JUDGMENT**

16 Defendants Adam Brendel, John "James" Buchanan, Timothy Howard and William Miller, by  
17 and through counsel Aaron D. Ford, Attorney General of the State of Nevada, and Darby G. Phelps,  
18 Deputy Attorney General, hereby submit their Motion for Extension of Time to File Motion for  
19 Summary Judgment. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the  
20 following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 Defendants respectfully request a thirty (30) day extension of time out from the current deadline  
23 (April 10, 2019) to file a motion for summary judgment in this case. Counsel for Defendants is  
24 confronted with numerous competing deadlines and a high workload due to staffing changes in the  
25 Office of the Attorney General. However, such obstacles are currently being resolved and the requested  
26 extension of time should afford Defendants adequate time file a motion for summary judgment in this  
27 case.

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

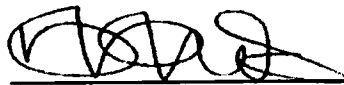
When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed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

Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will allow for more thorough dispositive motion briefing to narrow or eliminate issues prior to further proceedings. The requested thirty (30) day extension of time should permit Defendants time to file a motion for summary judgment. Defendants assert that the requisite good cause is present to warrant the requested extension of time.

For these reasons, Defendants respectfully request a thirty (30) day extension of time from the current deadline to file a motion for summary judgment, with a new deadline to and including Friday, May 10, 2019.

DATED this 9th day of April, 2019.

AARON D. FORD  
Attorney General

By:   
DARBY G. PHELPS  
Deputy Attorney General  
State of Nevada  
Bureau of Litigation  
Public Safety Division

*Attorneys for Defendants*

IT IS SO ORDERED.

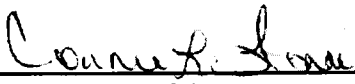
  
U.S. MAGISTRATE JUDGE

DATED: 4/10/2019

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 9th day of April, 2019, I caused to be served a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT**, by U.S. District Court CM/CFE Electronic Filing to:

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An employee of the  
Office of the Attorney General

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