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**FILED** RECEIVED **ENTERED SERVED ON** COUNSEL/PARTIES OF RECORD MAR 2 5 2019 CLERK US DISTRICT COURT DISTRICT OF NEVADA BY: **DEPUTY** 

Attorneys for Defendants D. Aja, Isidro Baca, Ruben Diaz-Ramirez, Jo Gentry, Holly Skulstad and Brian Williams

### UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

LAUSTEVEION JOHNSON.

Plaintiff,

J. YOUNGBLOOD, et al.,

Defendants.

Case No. 3:16-cv-00693-MMD-CBC

BRDER

MOTION TO EXTEND THE DEADLINE TO FILE MOTIONS FOR SUMMARY JUDGMENT (Third Request)

Defendants, D. Aja, Isidro Baca, Ruben Diaz-Ramirez, Jo Gentry, Holly Skulstad, and Brian Williams, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Robert W. DeLong, Deputy Attorney General, hereby move for an extension to the motion for summary judgment deadline in this case because defendants are still waiting to receive a finalized declaration that they intend to use in the summary judgment motion, and because Defendants are attempting to settle the matter. This motion is made and based upon the following Memorandum of Points and Authorities and all of the pleadings and papers on file herein.

#### MEMORANDUM OF POINTS AND AUTHORITIES

This is Defendants' Third request for an extension of time to extend the deadline to file motions for summary judgment. The present deadline for the filing of dispositive motions in this matter is today, March 21, 2019. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendants respectfully request an additional 14 days to file a motion for summary judgment in this matter, or until April 4, 2019, because

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Defendants are still waiting to receive a finalized declaration that they intend to use in the summary judgment motion, and because Defendants are attempting to settle the matter with the Plaintiff. Undersigned counsel has scheduled a call with the Plaintiff tomorrow to conduct additional settlement discussions based on correspondence received from Plaintiff.

Defendants assert that good cause exists for this Court to enlarge the time allowed for them to file a motion for summary judgment, and request that the deadline to file summary judgment motions be extended to no later than Thursday, April 4, 2019. This request is made in good faith and not for the purpose of delay. The Defendants respectfully submit that none of the parties will be prejudiced by the extension of time sought.

DATED this 21st day of March, 2019.

AARON D. FORD Attorney General

By:

ROBERT W. DeLONG
Deputy Attorney General
State of Nevada
Bureau of Public Affairs
Public Safety Division

W. D

Attorneys for Defendants

No further cextensions shacke granted.

TIS SO ORDERED

U.S. MAGISTRATE JUDGE

DATED. 3/25/2019

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