

1 ADAM PAUL LAXALT  
Attorney General  
2 Jessica Perlick (Bar. No. 13218)  
Deputy Attorney General  
3 State of Nevada  
Office of the Attorney General  
4 555 E. Washington Ave., #3900  
Las Vegas, NV 89101  
5 (702) 486-3825 (phone)  
(702) 486-2377 (fax)  
6 JPerlick@ag.nv.gov

7 Attorneys for Respondents

8 UNITED STATES DISTRICT COURT  
9 CLARK COUNTY, NEVADA

10 MARCELL WILLIAMS,

11 Petitioner,

12 vs.

13 TIMOTHY FILSON, et al.,

14 Respondents.  
15

Case No. 3:17-cv-00180-RCJ-WGC

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PETITION FOR WRIT OF  
HABEAS CORPUS (ECF NO. 6 )**

**(SECOND REQUEST)**

16  
17 Respondents move this Court for an extension of time of seven days, up to and including  
18 October 20, 2017, in which to respond to Petitioner's Petition for Writ of Habeas Corpus (ECF No. 6).  
19 This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is  
20 based upon the attached declaration of counsel.

21 This is the first enlargement of time sought by Respondents and is brought in good faith and not  
22 for the purpose of delay.

23 DATED this 13<sup>th</sup> day of October, 2017.

24 Submitted by:

25 ADAM PAUL LAXALT  
Attorney General

26  
27 By: /s/ Jessica Perlick  
JESSICA PERLICK (Bar. No. 13218)  
Deputy Attorney General  
28

**DECLARATION OF JESSICA PERLICK**

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

I, JESSICA PERLICK, being first duly sworn under oath, depose and state 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 Deputy Attorney General in the Office of the Nevada Attorney General. I have been  
7 assigned to represent Respondents in *Marcell Williams v. Timothy Filson, et al.*, Case No. 3:17-cv-  
8 00180-RCJ-WGC, and as such, have personal knowledge of the matters contained herein.

9 2. The Court issued its Order directing a response or other answer prior to my starting my  
10 position at the Attorney General’s Office.

11 3. In addition to the instant case, I am responsible for approximately 50% of all state court  
12 habeas petitions that challenge time credits, with an average of 20-25 responses due per week. I am also  
13 responsible for certain non-time credit state petitions and direct appeals to the Nevada Supreme Court  
14 arising out of Attorney General Prosecutions.

15 4. Through inadvertence, I mistook the amended due date for this response as the due date  
16 for a case involving a similarly named inmate. In that state court case, the inmate’s counsel sought an  
17 extension, and my due date was ultimately vacated. As such, I did not realize my error until I prepared  
18 to send this response for review, having finished the final draft and obtained the relevant exhibits.

19 5. The response is required to go through a review process prior to filing, and the person in  
20 charge of that review is currently finalizing a response in an unrelated petition. Therefore, the instant  
21 response will not be final until next week.


22 6. Therefore, Respondents request a brief extension of time of seven judicial days to file a  
23 response to Williams’ Petition for Habeas Corpus, through October 20, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 13, 2017.

24  
25  
26 /s/ Jessica Perlick  
27 Jessica Perlick (Bar. No. 13218)  
28 Denutv Attorney General

IT IS SO ORDERED.

  
ROBERT C. JONES, Senior District Judge  
DATED: This 14<sup>th</sup> day of January, 2018.