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6 Attorneys for United States of America

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 MARY KIM PICCININI, and  
GEORGE ELDRIDGE & SON, INC.,

11 Plaintiffs,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.  
15

Case No. 3:17-cv-00584-HDM-WGC

**STIPULATION FOR EXTENSION OF  
TIME TO FILE ANSWER**

**(FIRST REQUEST)**

16 COME NOW Defendant, United States of America, and Plaintiffs Mary Kim Piccinini  
17 and George Eldridge & Son, Inc., and hereby stipulate and agree that Defendant may have a one-  
18 week extension to file its Answer to Plaintiffs' Complaint. (ECF No. 1). On April 30, 2018, the  
19 Court granted in part and denied in part Defendant's motion to dismiss. (ECF No. 18).  
20 Defendant's Answer is now due on May 14, 2018. *See* Fed. R. Civ. P. 12(a)(4) ("Unless the court  
21 sets a different time, serving a motion under this rule alters these periods as follows: \* \* \* [I]f the  
22 court denies the motion or postpones its disposition until trial, the responsive pleading must be  
23 served within 14 days after notice of the court's action[.]"). An extension is needed, however,  
24 because defense counsel's office is moving to the federal courthouse this week and the office

1 server will be shut down for part of that time, thereby inhibiting defense counsel's ability to  
2 finalize Defendant's answer. Defense counsel also has a number of motions and responses due in  
3 other cases over the next two weeks. An extension would give Defendant up to and including  
4 May 21, 2018, in which to file its Answer.

5 Defense counsel contacted Plaintiffs' counsel via email, and Plaintiffs' counsel advised  
6 that they do not object to Defendant's extension request. This is Defendant's first extension  
7 request. Defendant seeks this extension request in good faith and not for the purpose of delay.

8 Dated: May 14, 2018.

9 DAYLE ELIESON  
10 United States Attorney

ROSE LAW OFFICE

11 s/ Holly A. Vance  
12 HOLLY A. VANCE  
Assistant United States Attorney  
Counsel for Defendant

s/ Sean P. Rose  
SEAN P. ROSE  
Counsel for Plaintiffs

13 IT IS SO ORDERED.

14  
15 DATED: May 15, 2018.

16  
17 William G. Cobb  
18 UNITED STATES MAGISTRATE JUDGE  
19  
20  
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