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7 *Attorneys for Defendants*  
*Michele Ewing and*  
8 *Michelle Clay*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 BENJAMIN ESPINOSA,

12 Plaintiff,

13 vs.

14 FILSON, et al.,

15 Defendant.

Case No. 3:18-cv-00298-MMD-CBC

**DEFENDANTS' MOTION FOR EXTENSION  
OF TIME TO OPPOSE MOTIONS FILED  
DURING THE STAY**

16 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendants Michele Ewing and Michelle Clay, by and  
17 through counsel, Adam Paul Laxalt, Nevada Attorney General, and Robert W. DeLong, Deputy  
18 Attorney General, hereby move to extend the deadline to file Oppositions to (1) Plaintiff's Motion for  
19 Leave to Amend 42 U.S.C. § 1983 Complaint (ECF No. 25), (2) Plaintiff's Motion to Extend Prison  
20 Copy Work Limit for Federal 42 U.S.C. § 1983 Action (ECF No. 26), and (3) Plaintiff's Motion to  
21 Appoint Counsel (ECF No. 27) for an additional 14 days. Defendants calculate that Oppositions to  
22 these motions are presently due on December 28, 2018.

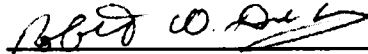
23 Defendants seek an additional 14 days, until January 11, 2018, to file oppositions because  
24 undersigned counsel has been out for family medical leave on December 24<sup>th</sup> and 26<sup>th</sup>, and will also be  
25 out on December 28<sup>th</sup> (the current opposition deadline) for family medical leave. This request is made  
26 in good faith and not for the purpose of delay. Defendants note that Plaintiff has recently filed a motion  
27 to stay these proceedings and to consolidate this action with another matter. (ECF No. 37 & 38.)

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1 The Defendants respectfully submit that none of the parties will be prejudiced by the extension  
2 of time sought.

3 DATED this 27<sup>th</sup> day of December, 2018.

4 ADAM PAUL LAXALT  
5 Attorney General

6 By:   
7 ROBERT W. DELONG  
8 Deputy Attorney General  
9 State of Nevada  
10 Bureau of Litigation  
11 Public Safety Division

12 IT IS SO ORDERED  
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14 U.S. MAGISTRATE JUDGE  
15 DATED: 1/7/2019


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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 27th day of December, 2018, I caused to be served, a true and correct copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO OPPOSE MOTIONS FILED DURING THE STAY**, by U.S. District Court CM/ECF Electronic Filing on:

Benjamin Espinosa #74296  
Northern Nevada Correctional Center  
C/O NNCC Law Librarian  
P.O. Box 7000  
Carson City, NV 89702  
lawlibrary@doc.nv.gov

  
An employee of the  
Office of the Attorney General

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