

1 AARON D. FORD  
2 Attorney General  
3 KAYLA D. DORAME, Bar No. 15533  
4 Deputy Attorney General  
5 State of Nevada  
6 Public Safety Division  
7 100 N. Carson Street  
Carson City, NV 89701-4717  
Tel: (775) 684-1259  
E-mail: kdorame@ag.nv.gov

7 *Attorneys for Defendants*

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

12 WILLIAM LEWIS,  
13 vs.  
14 DR. TED HANF, et al.,  
15 Defendants.

Plaintiff,

Case No. 3:19-cv-00625-GMN-CLB

16  
17 **DEFENDANTS' MOTION TO EXTEND  
THE DEADLINE TO FILE THE  
STIPULATION AND ORDER FOR  
DISMISSAL WITH PREJUDICE  
(FIRST REQUEST)**

18 Defendants, by and through counsel, Aaron D. Ford, Attorney General of the State  
19 of Nevada, and Kayla D. Dorame, Deputy Attorney General, move to extend the deadline  
20 to file the Stipulation and Order for Dismissal with Prejudice in this matter by 7 days.

21 William Lewis is currently in the lawful custody of the Nevada Department of  
22 Corrections (NDOC) and is housed at Warm Springs Correctional Center (WSCC). On  
23 March 24, 2021, Lewis and Defendants participated in an Early Mediation Conference  
24 where a settlement was reached. ECF No. 23. The original deadline to file the  
25 Stipulation and Order for Dismissal with Prejudice was scheduled for April 22, 2021. *Id.*

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

27 When an act may or must be done within a specified time, the  
28 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.

Defense counsel requests a seven (7) day extension to obtain the necessary signatures from the proper parties. Defense counsel never received the signed settlement agreement or stipulation and order from Lewis, so Defense counsel had to reach out to Lewis' caseworker to obtain those documents signed. Defense counsel only obtained those documents in the afternoon of April 22, 2021 and still needs a signature from their client.

Good cause exists to extend time to file the Stipulation and Order for Dismissal because Defense counsel had to reach out to various individuals to obtain those documents and needs only a short amount time to obtain an additional signature. Defense counsel requests until **April 29, 2021** to file the stipulation and order.

DATED this 22nd day of April, 2021.

AARON D. FORD  
Attorney General

By: /s/ *Kayla D. Dorame*  
KAYLA D. DORAME, Bar No. 15533  
Deputy Attorney General

*Attorneys for Defendants*

IT IS SO ORDERED.

Dated: April 26, 2021

  
UNITED STATES MAGISTRATE JUDGE

## CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 22nd day of April, 2021, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION TO EXTEND THE DEADLINE TO FILE THE STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE (FIRST REQUEST)**, by depositing for mailing via the U.S. Postal Service, to the following:

William Lewis #1169143  
Warm Springs Correctional Center  
P.O. Box 7007  
Carson City, NV 89701

Connie R. Ladd  
An employee of the  
Office of the Attorney General