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WILLIAM SCOTT HOEN
CLERK

BY  DEPUTY

IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

ZENAIDA DAGUSEN, and individual, *et al.*,

Plaintiffs,

vs.

FRANCISCO AGUILAR, in his official
capacity as Nevada Secretary of State, *et al.*,

Defendants

Case No.: 24 OC 00153 1B

Dept. No. I

SECRETARY OF STATE'S UNOPPOSED MOTION TO EXTEND DEADLINE

First Request for Extension

Defendant Francisco Aguilar, in his official capacity as Nevada Secretary of State ("Secretary"), hereby files this unopposed motion to extend his deadline to respond to Plaintiffs' Complaint for Declaratory and Injunctive Relief ("Complaint"). This motion is supported by the declaration of Laena St-Jules, Esq., attached as Exhibit 1.

Service was completed on the Secretary in this action on October 1, 2024. Ex. 1, St-Jules Decl. ¶ 2. Accordingly, pursuant to NRCP 12(a)(2), the deadline for the Secretary to respond to the Complaint is November 15, 2024. The Secretary has a drafted motion to

1 dismiss the Complaint, but in light of ongoing discussions of a potential resolution of this
2 litigation among the parties, the Secretary seeks to allow the parties additional time to
3 explore resolution options before requiring the Court and the parties to incur potentially
4 unnecessary time and monetary expense. Ex. 1, St-Jules Decl. ¶¶ 3–4. The Secretary has
5 not made any prior request for an extension of time in this matter. *Id.* ¶ 5.

6 The Secretary proposes December 2, 2024 as the new deadline to file his response to
7 the Complaint. *Id.* ¶ 6. Counsel for the Secretary has spoken with counsel for the other
8 parties, and they confirmed they do not oppose this extension motion. *Id.* ¶ 7.

9 AFFIRMATION

10 The undersigned does hereby affirm that the document entitled Secretary of State's
11 Unopposed Motion to Extend Deadline does not contain personal information as defined in
12 NRS 239B.030(4), and further acknowledges that an affirmation will only be provided on
13 any additional documents if the document does contain personal information.

14 DATED this 15th day of November, 2024.

15 AARON D. FORD
16 Attorney General

17 By: 

18 LAENA ST-JULES (Bar No. 15156)
19 Senior Deputy Attorney General
20 DEVIN A. OLIVER (Bar No. 16773C)
21 Deputy Attorney General

22 *Attorneys for Secretary of State*
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on this 15th day of November, 2024, I served a true and correct copy of the foregoing **SECRETARY OF STATE'S UNOPPOSED MOTION TO EXTEND DEADLINE** by electronic mail to:

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and Nevada State Democratic Party*



Aaron D. Van Sickle
AG Legal Secretary

INDEX OF EXHIBITS

EXHIBIT No.	EXHIBIT DESCRIPTION	NUMBER OF PAGES
1.	Declaration of Laena St-Jules, Esq.	1

Exhibit 1

Exhibit 1

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1. I am a Senior Deputy Attorney General with the Office of the Nevada Attorney General. I am counsel to Defendant Francisco Aguilar, in his official capacity as Nevada Secretary of State ("Secretary"). I make this declaration based on personal knowledge.

3. The Secretary has a drafted motion to dismiss the complaint in this action.

5. The Secretary has not made any prior request for an extension of time in this matter.

7. On November 14, 2024, I spoke with Brian Hardy, counsel for the plaintiffs, and Bradley Schrager, counsel for the other defendants, and confirmed they do not oppose the Secretary's motion to extend the deadline to file his response to the Complaint.

Executed on this 15th day of November, 2024.

Laena St-Jules, Esq.