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RECD & FILED

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WILLIAM SCOTT HOEN
CLERK

BY 
DEPUTY

8 Attorneys for Defendant Secretary of State

9

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

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

Case No.: 24 OC 00153 1B

13 Plaintiffs,

Dept. No. I

14 vs.

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

17 Defendants

19 **SECRETARY OF STATE'S UNOPPOSED MOTION TO EXTEND DEADLINE**

20 **First Request for Extension**

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

26 Service was completed on the Secretary in this action on October 1, 2024. Ex. 1,
27 St-Jules Decl. ¶ 2. Accordingly, pursuant to NRCP 12(a)(2), the deadline for the Secretary
28 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
DEVIN A. OLIVER (Bar No. 16773C)
Deputy Attorney General

20 *Attorneys for Secretary of State*

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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Aaron D. Van Sickle
AG Legal Secretary

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

Exhibit 1

Exhibit 1

DECLARATION OF LAENA ST-JULES, ESQ.

I, LAENA ST-JULES, declare as follows:

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.

2. Service was completed on the Secretary in this action on October 1, 2024.

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

4. However, the parties are discussing potential paths to resolve this litigation, and the Secretary seeks an extension of the deadline to file his response to the complaint to allow the parties additional time to explore resolution options before requiring the Court and the parties to incur potentially unnecessary time and monetary expense.

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

6. The Secretary proposes December 2, 2024 as the new deadline to file his response to the Complaint.

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.

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

Executed on this 15th day of November, 2024.


Laena St-Jules, Esq.