

Lori Rifkin, Esq. (CA # 244081)
(*pro hac vice*)
Rifkin Law Office
2855 Telegraph Avenue, Suite 517
Berkeley, CA 94705
Telephone: (510) 414-4132
Email: lrifkin@rifkinlawoffice.com

Dan Stormer, Esq. (CA # 101967)
(*pro hac vice*)
Shaleen Shanbhag, Esq. (CA # 301047)
(*pro hac vice*)
HADSELL STORMER RENICK & DAI LLP
128 N. Fair Oaks Avenue
Pasadena, California 91103
Telephone: (626) 585-9600
Facsimile: (626) 577-7079
Emails: dstormer@hadsellstormer.com
sshahbhag@hadsellstormer.com

Attorneys for Plaintiff

Craig Durham (ISB # 6428)
Deborah Ferguson (ISB # 5333)
FERGUSON DURHAM, PLLC
223 N. 6th Street, Suite 325
Boise, ID 83702
Telephone: 208-345-5183
Facsimile: 208-908-8663
Emails: chd@fergusondurham.com
daf@fergusondurham.com

Amy Whelan, Esq. (CA # 215675)
(*pro hac vice*)
Julie Wilensky, Esq. (CA # 271765)
(*pro hac vice*)
National Center for Lesbian Rights
870 Market Street, Suite 370
San Francisco, CA 94102
Telephone: 415-365-1338
Facsimile: 415-392-8442
Email: AWhelan@NCLRights.org
jwilensky@NCLRights.org

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

ADREE EDMO (a/k/a MASON EDMO),

Plaintiff,

v.

IDAHO DEPARTMENT OF CORRECTION;
HENRY ATENCIO, in his official capacity;
JEFF ZMUDA, in his official capacity;
HOWARD KEITH YORDY, in his official
and individual capacities; CORIZON, INC.;
SCOTT ELIASON; MURRAY YOUNG;
RICHARD CRAIG; RONA SIEGERT;
CATHERINE WHINNERY; and DOES 1-15;

Defendants.

Case No.: 1:17-cv-00151-BLW

**PLAINTIFF'S REQUEST FOR EXTENSION
OF TIME TO RESPOND TO DEFENDANTS'
JOINT MOTION TO STAY**

Complaint Filed:	April 6, 2017
Discovery Cut-Off:	None Set
Motion Cut-Off:	None Set
Trial Date:	None Set

Plaintiff requests an extension of 10 days to respond to Defendants' Joint Motion to Stay, Dkt. 214. As set forth below, there is good cause for the Court to grant this request. *See* Fed. R. Civ. P. 6(b)(1)(A); Loc. Civ. R. 6.1(a); *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1260 (9th Cir. 2010) (good cause may be established where the requested relief is reasonable, justified, and will not result in prejudice to any party).

During the September 16, 2019 status conference in this case in which the Court set the briefing schedule for Defendants' motion to stay, the Court and parties discussed that Defendants' filing of their motion on September 30, 2019, would be the first time Defendants would set forth the scope of their requested stay and the bases on which they are seeking such stay. Having reviewed Defendants' motion and the bases therefore, Plaintiff believes it would benefit all parties and the Court for Plaintiff and her counsel to have additional time to consider the motion and explore whether any stipulation may be reached. Plaintiff's counsel requires additional time to consult with Plaintiff through confidential attorney-client communications, which take some time to arrange due to the fact that Plaintiff is incarcerated. Counsel anticipates that this may be followed by further meeting and conferring between the parties to see if any stipulation may be reached to propose to the Court. Because a central issue in Defendants' motion is how to proceed with this litigation in the most efficient manner while preserving and protecting the parties' rights, there is good cause to ensure that the parties are able to present the Court with the fullest picture of the options for proceeding in response to Defendants' motion.

Plaintiff's request for a 10-day extension of time is reasonable given the circumstances and will not result in prejudice to any party. Plaintiff has not previously requested an extension of time from this Court in this action and IDOC Defendants have indicated that they do not oppose Plaintiff's request.

//

//

//

//

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of October, 2019, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Dylan Eaton
deaton@parsonsbehle. com

J. Kevin West
kwest@parsonsbehle. com

Attorneys for Corizon Defendants

Brady James Hall
brady@melawfirm.net

Marisa S. Crecelius
marisa@melawfirm.net

Attorneys for IDOC Defendants

/s/ - Lori Rifkin

Lori Rifkin