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**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 AMENDED 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

During the September 16, 2019 Scheduling Conference in this case, the Court set the following deadlines with respect to Defendants' motion to stay: September 30, 2019 as Defendants' motion filing deadline, and October 7, 2019 as Plaintiff's response deadline. Dkt. 212. The ECF docket entry for Defendants' motion to stay, Dkt. 214, lists October 21, 2019 as the deadline for Plaintiff's response to the motion. It is Plaintiff's understanding that the October 7, 2019 deadline set by the Court in the Scheduling Conference minutes, Dkt. 212, is the operative deadline. *See id.* ("These minutes shall stand as the order of the Court."). Therefore Plaintiff files this request for an extension of 10 days (October 17, 2019) 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). If, in fact, the operative deadline for Plaintiff's response is October 21, 2019, Plaintiff does not require any extension, but seeks clarification of the filing deadline.

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 beyond October 7, 2019 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 and Corizon Defendants do not oppose Plaintiff's request for this 10-day extension.

Therefore, Plaintiff requests that this Court grant Plaintiff's motion for an extension of time to October 17, 2019 to respond to Defendants' motion. In the alternative, if the operative deadline for Plaintiff's response is October 21, 2019, Plaintiff requests clarification to that effect.

Dated: October 4, 2019

Respectfully Submitted,  
FERGUSON DURHAM  
HADSELL STORMER RENICK & DAI LLP  
NATIONAL CENTER FOR LESBIAN RIGHTS  
RIFKIN LAW OFFICE

By:           /s/ - Lori Rifkin            
Lori Rifkin

Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 4th 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:

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