	1		
1	OFFICE OF THE ATTORNEY GENERAL		
2	Edward Manibusan Attorney General		
3	James M. Zarones Assistant Attorney General		
4	Hon Juan A. Sablan Mem. Bldg., 2 nd Floor Saipan, MP 96950-8907		
5	Tel: (670) 237-7500 Fax: (670) 664-2349		
6	e-mail: jzarones@dps.gov.mp Attorney for Defendants		
7			
8	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS		
9	LI-RONG RADICH AND		
10	DAVID RADICH,	Civil Action No. 14-0020	
11	Plaintiffs, v.		
12	JAMES C. DELEON GUERRERO, in his	STIPULATION TO EXTEND TIME	
13	official capacity as Commissioner of the Department of Public Safety of the		
14	Commonwealth of the Northern Mariana		
15	Islands, and Larissa Larson, in her official capacity as Secretary of the Department		
16	of Finance of the Commonwealth of the Northern Mariana Islands,		
17	Defendants.		
18		wich council pursuant to Pula 6(h) of the Foderal	
19	•	ough counsel, pursuant to Rule 6(b) of the Federal	
20	Rules of Civil Procedure and Local Rule 7.1(l	h), and request this honorable Court approve an	
21	extension of time for Defendants to answer or otherwise respond to Plaintiffs' Complaint. The		
22	parties stipulate that the Defendants shall have until April 17, 2015, to answer or otherwise		
23	respond to Plaintiffs' Complaint. Presently, Defendant Guerrero must respond to the First		
24	Amended Complaint on or before April 5, 2015.		
25			
26			
27			
28			

Case 1:14-cv-00020 Document 28 Filed 04/02/15 Page 2 of 4

1	/s/	/s/
	Daniel T. Guidotti (#F0473 CNMI)	James M. Zarones (T0102)
2	Marianas Pacific Law LLC 2nd Floor, J.E. Tenorio Bldg Middle Bood, Cycle Boi	Hon Juan A. Sablan Mem. Bldg, 2nd Floor
3	Middle Road, Gualo Rai PO Box 506057	Saipan, MP 96950-8907 Tel (670) 237-7500
4	Saipan, MP 96950 Tel (670) 233-0777	jzarones@dps.gov.mp Attorney for Defendants
5	dan.guidotti@mpaclaw.com Local Counsel	
6	Attorney for Plaintiff	
7	/0/	
8	David G. Sigale, Esq. (#6238103) LAW FIRM OF DAVID G. SIGALE, P.C.	
9	799 Roosevelt Road, Suite 207	
10	Glen Ellyn, IL 60137 Tel: 630-452-4547	
11	Fax: 630-596-4445 dsigale@sigalelaw.com	
12	Appearing <i>Pro hac vice</i>	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
_0		

1 2 3 4 5 6 7 8		TES DISTRICT COURT		
9	FOR THE NORTHERN MARIANA ISLANDS			
10	LI-RONG RADICH AND DAVID RADICH,	Civil Action No. 14-0020		
11	Plaintiffs, v.	AFFIDAVIT IN SUPPORT OF STIPULATION TO EXTEND TIME		
12 13 14 15 16 17	JAMES C. DELEON GUERRERO, in his official capacity as Commissioner of the Department of Public Safety of the Commonwealth of the Northern Mariana Islands, and Larissa Larson, in her official capacity as Secretary of the Department of Finance of the Commonwealth of the Northern Mariana Islands,			
18	Defendant.			
19	COMES NOW James M. Zarones and de	eclares as follows:		
20	1. I am duly admitted to the practice of law in the Commonwealth and before this Court.			
21	2. I am an Assistant Attorney General at the Office of the Attorney for the			
22	Commonwealth of the Northern Mariana Islands.			
23	3. I represent the Defendants in the above-titled case.			
24	4. I am presently off-island and am not able to devote adequate time to properly respond			
2526	to the First Amended Complaint on or before April 5, 2015.			
27	5. There have been no previous extensions of time to respond to the First Amended			
28	Complaint.			

Case 1:14-cv-00020 Document 28 Filed 04/02/15 Page 4 of 4

1	6. There are no deadlines previously set in this case.		
2	RESPECTFULLY SUBMITTED.	OFFICE OF THE ATTORNEY GENERAL	
3	DATED: April 3, 2015		
4		James Zarones, Bar No. T0102	
5		Assistant Attorney General Office of the Attorney General Counsel for Defendant	
6		Counsel for Defendant	
7			
8	CERTIFI	CATE OF SERVICE	
9	I hereby certify that the above and foregoing was electronically filed on April 3, 2015.		
10			
11	with service requested to all parties of reco	ora.	
12		<u>/s/</u>	
13		James Zarones, Bar No. T0102 Assistant Attorney General	
14		Office of the Attorney General Counsel for Department of Public Safety	
15		Commonwealth of the Northern Mariana Islands	
16		Northern Mariana Islands	
17			
18			
19			
20			
21			
22			
2324			
25			
25 26			
27			
28			
_0			