1	OFFICE OF THE ATTORNEY GENERAL Gilbert Birnbrich			
2	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 Defendant			
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.	STIPULATION TO EXTEND TIME		
12				
13	JAMES C. DELEON GUERRERO, in his official capacity as Commissioner of the			
14	Department of Public Safety of the Commonwealth of the Northern Mariana			
15	Islands,			
16	Defendant.			
17	COMES NOW, Plaintiffs and Defend	dant, by and through their respective counsel,		
18	pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1(h), and hereby			
19	stipulate, and request this honorable Court approve an extension of time for Defendant to answer			
20	or otherwise respond to Plaintiff's Complaint. The parties stipulate that the Defendant shall have			
21	until October 15, 2014, to answer or otherwise respond to Plaintiff's Complaint.			
22	until October 13, 2014, to aliswer of otherwise r	espond to Fiamum's Complaint.		
23	Daniel T. Guidotti (#F0473 CNMI)	James M. Zarones (T0102)		
24	Marianas Pacific Law LLC	Assistant Attorney General		
25	2nd Floor, J.E. Tenorio Bldg Middle Road, Gualo Rai	Hon Juan A. Sablan Mem. Bldg, 2nd Floor Saipan, MP 96950-8907		
26	PO Box 506057 Saipan, MP 96950	Tel (670) 237-7500 jzarones@dps.gov.mp		
27	Tel (670) 233-0777 dan.guidotti@mpaclaw.com	Attorney for Defendant		
28	Attorney for Plaintiff			

1 2 3 4 5 6 7 8	Gilbert Bi Attorney G James M. Assistant Hon Juan Saipan, M Tel: (6 Fax: (6' e-mail: jza	General Zarones Attorney General A. Sablan Mem. Bldg., 2 nd Floor IP 96950-8907 70) 237-7500 70) 664-2349 arones@dps.gov.mp or Defendant IN THE UNITED STA	ΓES DISTRICT COURT N MARIANA ISLANDS
9	LLDON		N WAKIANA ISLANDS
10	LI-RONG RADICH AND DAVID RADICH,		Civil Action No. 14-0020
11 12	Plaintiffs, v.		AFFIDAVIT IN SUPPORT OF STIPULATION TO EXTEND TIME
13 14 15 16	official o Departn	C. DELEON GUERRERO, in his capacity as Commissioner of the nent of Public Safety of the nwealth of the Northern Mariana Defendant.	
17	CO	OMES NOW James M. Zarones and d	eclares as follows:
18	1.	I am duly admitted to the practice of	law in the Commonwealth and before this Court.
19	2.	I am an Assistant Attorney General a	at the Office of the Attorney for the
2021		Commonwealth of the Northern Mar	iana Islands.
22	3.	I represent the Defendant in the above-titled case.	
23	4.	The Commonwealth was properly served on September 10, 2014.	
24	5.	Plaintiff's Complaint contains challenges that implicate the Covenant and the	
25		Commonwealth Weapons Control A	ct.
26	6.	Because of the complexity of the issues raised in the Complaint, the undersigned	
27		requires additional time to prepare a	n Answer or otherwise respond to the Complaint.
28			

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1	7. There have been no previous extensions of time in this case.		
2	8. There are no deadlines previously set in this case.		
3	RESPECTFULLY SUBMITTED.	OFFICE OF THE ATTORNEY GENERAL	
4	DATED: September 29, 2014		
5	,	/s/ James Zarones, Bar No. T0102	
6		Assistant Attorney General	
7		Office of the Attorney General Counsel for Defendant	
8			
9			
10	CERTIFICATE OF SERVICE		
11	I hereby certify that the above and foregoing was electronically filed on September 29		
12	2014, with service requested to all parties of record.		
13			
14		<u>/s/</u> James Zarones, Bar No. T0102	
15		Assistant Attorney General Office of the Attorney General	
16		Counsel for Department of Public Safety	
17		Commonwealth of the Northern Mariana Islands	
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