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 Defendant		
7			
8	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS		
9	DAVID J. RADICH AND LI-RONG		
10	RADICH,	Civil Action No. 14-0020	
1112	Plaintiffs, v.	SECOND STIPULATION TO EXTEND TIME	
13	JAMES C. DELEON GUERRERO, in his		
14	official capacity as Commissioner of the Department of Public Safety of the		
15	Commonwealth of the Northern Mariana Islands, and LARISSA LARSON, in her		
16	official capacity as Secretary of the		
17	Department of Finance of the Commonwealth of the Northern Mariana		
18	Islands,		
19	Defendant.		
20	COMES NOW, Plaintiffs and Defendants, by and through their respective counsel,		
21	pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1(h), and hereby		
22	stipulate, and request this honorable Court approve an extension of time for Defendants to		
23	answer or otherwise respond to Plaintiff's First Amended Complaint.		
24	The parties stipulate that the Defendants shall not be required to Answer or otherwise		
25	respond to Plaintiffs' First Amended Complaint until the Court rules on Plaintiffs' Motion for		
26	Leave to File Second Amended Complaint. T	hereafter, if the Court denies Plaintiffs' motion,	
27	then the Defendants shall have five calendar d	avs to answer or otherwise respond to Plaintiffs'	

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1	First Amended Complaint.	
2	•	
3	Daniel T. Guidotti (#F0473 CNMI)	James M. Zarones (T0102)
4	Marianas Pacific Law LLC 2nd Floor, J.E. Tenorio Bldg	Assistant Attorney General Hon Juan A. Sablan Mem. Bldg, 2nd Floor
5	Middle Road, Gualo Rai PO Box 506057	Saipan, MP 96950-8907 Tel (670) 237-7500
6	Saipan, MP 96950 Tel (670) 233-0777	jzarones@dps.gov.mp Attorney for Defendant
7	dan.guidotti@mpaclaw.com Attorney for Plaintiff	Attorney for Defendant
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1	OFFICE OF THE ATTORNEY GENERAL Edward Manibusan		
2	Attorney General James M. Zarones		
3	Assistant Attorney General Hon Juan A. Sablan Mem. Bldg., 2 nd Floor		
4	Saipan, MP 96950-8907 Tel: (670) 237-7500		
5	Fax: (670) 664-2349 e-mail: jzarones@dps.gov.mp		
6	Attorney for Defendant		
7			
8	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS		
9	DAVID J. RADICH AND LI-RONG		
10	RADICH,	Civil Action No. 14-0020	
11	Plaintiffs,	AFFIDAVIT IN SUPPORT OF STIPULATION TO EXTEND TIME	
12	V.		
13	JAMES C. DELEON GUERRERO, in his official capacity as Commissioner of the		
14	Department of Public Safety of the		
15	Commonwealth of the Northern Mariana Islands, and LARISSA LARSON, in her		
16	official capacity as Secretary of the		
	Department of Finance of the		
17	Commonwealth of the Northern Mariana Islands,		
18	,		
19	Defendant.		
20	COMES NOW James M. Zarones and declares as follows:		
21	1. I am duly admitted to the practice of	law in the Commonwealth and before this Court.	
22	2. I am an Assistant Attorney General a	at the Office of the Attorney for the	
23	Commonwealth of the Northern Mar	riana Islands.	
24	3. I represent the Defendants in the abo	ove-titled case.	
25	4. I am requesting an extension because it may be unnecessary for the Defendants to		
26	answer or otherwise respond to Plair	ntiffs' First Amended Complaint.	
27		•	
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1	5. The Court previously granted an extension to Defendant James C. Deleon Guerrero to			
2	answer or otherwise respond to Plaintiffs' First Amended Complaint.			
3	6. There are no other deadlines previously set in this case.			
4	RESPECTFULLY SUBMITTED. OFFICE OF THE ATTORNEY	GENERAL		
5	5 DATED: April 14, 2015			
6	6 James Zarones, Bar No. T0102			
7	Assistant Attorney General Office of the Attorney General Counsel for Defendants			
8	8 Counsel for Defendants			
9	9			
10				
11	11 CERTIFICATE OF SERVICE	CERTIFICATE OF SERVICE		
12	I hereby certify that the above and foregoing was electronically filed on	April 14, 2015,		
13	with service requested to all parties of record.			
14				
15	James Zarones, Bar No. 101	02		
16	Assistant Attorney General Office of the Attorney General	al		
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