

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

STATE OF NEW MEXICO, <i>ex rel.</i> HECTOR	§	
BALDERAS, Attorney General,	§	
	§	
Plaintiff,	§	Civ. No. 1:21-CV-00284-MV-JFR
	§	
v.	§	NEW MEXICO’S UNOPPOSED
	§	MOTION TO EXTEND DEADLINES
	§	
UNITED STATES NUCLEAR	§	
REGULATORY COMMISSION and	§	
CHAIRMAN CRISTOPHER HANSON, in his	§	
official capacity as Chairman of the	§	
Commission	§	
	§	
Defendant	§	

**STATE OF NEW MEXICO’S UNOPPOSED MOTION TO EXTEND DEADLINES**

Pursuant to Local Rule 7.2, Plaintiff, State of New Mexico, (“Plaintiff” or the “New Mexico”) through undersigned counsel, respectfully moves for an extension of the deadline for Plaintiff to respond to the United States Nuclear Regulatory Commission and Chairman Cristopher Hanson, in his official capacity as Chairman of the Commission, (collectively “Federal Defendants”) Motion to Dismiss First Amended Complaint, Doc. 12, until July 19, 2021 and an extension of the deadline for Federal Defendants to reply until August 16, 2021. Plaintiff provides the following as grounds for approving this unopposed motion to extend deadlines:

On May 17, 2021 New Mexico filed its First Amended Complaint for Declaratory Judgment with this Court. Doc. 7.

On June 17, 2021 the Federal Defendants filed a Motion to Dismiss the First Amended Complaint along with a brief in support of same. Doc. 12.

The New Mexico Federal Court Local Rule 7.4 provides for fourteen (14) days to respond to a motion to dismiss, and an additional fourteen (14) days for a reply. Therefore, the current deadline for New Mexico's response to the Federal Defendant's Motion to Dismiss is set for July 1, 2021 and the current deadline for the Federal Defendant's to file a reply is July 14, 2021.

Counsel for New Mexico has conferred with Counsel for the Federal Defendants, who do not oppose this Motion and agree to the proposed extensions of time set forth herein. All counsel agree that this extension does not waive any rights., privileges or defenses.

WHEREFORE, the State of New Mexico respectfully requests that the Court grant this unopposed motion permitting an extension of time for New Mexico to file its response to Federal Defendants' Motion to Dismiss until July 19, 2021 and extension of time for Federal Defendants to file a reply until August 16, 2021.

Dated: June 25, 2021

Respectfully submitted:

**HECTOR H. BALDERAS**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2021, the foregoing with attachments, if any, were submitted for filing electronically via the Court's CM/ECF system, which causes the parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Annemieke M. Tennis  
Annemieke M. Tennis