

IN THE SUPREME COURT OF THE STATE OF NEVADA

STEVE SISOLAK, GOVERNOR OF  
NEVADA; AARON D. FORD,  
ATTORNEY GENERAL OF  
NEVADA; GEORGE TOGLIATTI,  
DIRECTOR OF PUBLIC SAFETY;  
AND MINDY MCKAY,  
ADMINISTRATOR OF THE  
RECORDS, COMMUNICATIONS,  
AND COMPLIANCE DIVISION OF  
THE NEVADA DEPARTMENT OF  
PUBLIC SAFETY,

Appellants,

vs.

POLYMER80, INC.,

Respondent.

Supreme Court No. 83999  
Electronically Filed  
Sep 28 2022 02:05 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
FILE REPLY BRIEF  
(SECOND REQUEST)**

Appellants Governor Steve Sisolak, Attorney General Aaron D. Ford, Director George Togliatti and Administrator Mindy McKay move under Nevada Rule of Appellate Procedure 31(b)(3) for a 14-day extension of time to file their reply brief in this matter. The reply brief was originally due September 6, 2022. This Court granted the parties' stipulation extending the deadline by 30 days, making the current due date October 6, 2022. This second request would extend the deadline 14 days, to October 20, 2022.

Good cause exists for the extension. *See* Aug. 30, 2022 Order (permitting further extensions “upon motion clearly demonstrating good cause”). Deputy Solicitor General Kiel B. Ireland is drafting the reply brief. In addition to day-to-day tasks on about a dozen active cases, he is responsible for managing discovery in *Lincoln County Water District v. Nevada*, No. 2:20-cv-1891 (D. Nev. filed Oct. 19, 2020), and *Coyote Springs Investment, LLC v. State*, No. A-20-820384-B (Nev. 8th Jud. Dist. Ct. filed Aug. 28, 2020), two cases involving hundreds of millions of dollars of alleged liability and a massive number of documents. Managing the State’s discovery obligations has absorbed an unexpected amount of time in the last several weeks, necessitating a short second extension of time to file the reply brief in this case.

Moreover, the reply brief will be subject to internal review in the Office of the Solicitor General. In the next three weeks, the solicitor general will be assisting with and presenting oral argument in the U.S. Court of Appeals for the District of Columbia Circuit and this Court,<sup>1</sup> respectively, which will limit the Office’s ability to review the reply brief.

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<sup>1</sup> *Nev. Yellow Cab Corp. v. State*, No. 83014 (Nev. filed June 7, 2021).

Respondent's counsel, Brad Johnston, confirmed via email that Respondent does not oppose this request.

RESPECTFULLY SUBMITTED this 28th day of September 2022.

AARON D. FORD  
Attorney General

By: /s/ Kiel B. Ireland  
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## CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada Office of the Attorney General and that on this 28th day of September 2022, I filed and served the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** with the Clerk of the Court of the Supreme Court of Nevada, by using the Court's Electronic Filing System.

*/s/Sunny Southworth*  
An Employee of the  
State of Nevada  
Office of the Attorney General