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Electronically Filed
Jan 19 2011 04:55 p.m.
Tracie K. Lindeman

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7 IN THE SUPREME COURT OF THE STATE OF NEVADA
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10 VILLAGE LEAGUE TO SAVE INCLINE ASSETS,)
INC., a Nevada non-profit corporation, on behalf)
of its members and others similarly situated;)
11 MARYANNE INGEMANSON, Trustee of the)
Larry D. and Maryanne B. Ingemanson Trust; DEAN)
12 R. INGEMANSON, individual and as Trustee of the)
Dean R. Ingemanson Trust; J. ROBERT ANDERSON;)
13 and LES BARTA, on behalf of themselves and others)
similarly situated;)
14

Case No. 56030

15 Appellants,

16 vs.

17 STATE OF NEVADA, *ex rel.* State Board of
Equalization; WASHOE COUNTY; and BILL
18 BERRUM, Washoe County Treasurer;

19 Respondents.
20

21 **MOTION FOR EXTENSION OF TIME**
FOR APPELLANTS TO FILE REPLY BRIEF
22 **(SECOND REQUEST)**

23 Appellants move the Court pursuant to NRAP 31(b)(3) and NRAP 27 for a second
24 extension of time of one day to and including January 20, 2011, within which to file
25 appellants' reply brief. The reply briefs were originally due on December 2, 2010
26 (Washoe County respondents) and December 3, 2010 (State of Nevada). By stipulation of
27 the parties and order of this Court the original due dates were extended to January 19,
28 2011, with the requirement that a single reply brief be filed.

1 No previous request for extension has been denied in whole or in part. An
2 additional extension of one day is necessary in order to permit counsel to complete the
3 reply brief properly and to allow the completed brief to be reviewed by the appellants.
4 Counsel has been delayed in the preparation of the brief by the demands of personal and
5 family matters as more fully set forth in the attached declaration of counsel.
6

7 This request for extension is for a single day, making the reply brief due on January
8 20, 2011, rather than January 19, 2011.
9

10 DATED this 19th day of January, 2011.

11 MORRIS PETERSON
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13 By /s/Suellen Fulstone

14 Suellen Fulstone

15 Attorneys for Appellants
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DECLARATION OF SUELLEN FULSTONE

I, Suellen Fulstone, under penalty of perjury, state as follows:


1. I am an attorney duly licensed to practice law in the courts of the State of Nevada and of counsel with the law firm of Morris Peterson, attorneys for taxpayer respondents in the matter of "Village League to Save Incline Assets, Inc., *et al.* v. State of Nevada, Washoe County and Bill Berrum", Case No. 56030, in the Nevada Supreme Court.

2. The appellants' reply brief is presently due on January 19, 2011. One previous extension has been requested and granted.

3. I have been working to complete the reply brief. I had set several days aside to work on and complete the brief. I was, however, prevented from using those days to work on the brief by certain family matters. I returned to the office yesterday and anticipated that I could complete the brief in time to have it electronically filed today. After working all day, however, I have concluded that I cannot complete the brief in time.

4. I also generally allow time for my clients to review the briefs that I prepare to assure both their accuracy and their readability. Without the additional day requested, my clients will not have any opportunity to review this reply brief.

DATED this 19th day of January, 2011.


Suellen Fulstone

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 19th day of January, 2011. Electronic Service of the foregoing document shall be made in accordance with the Master Service list as follows:

Deonne Contine
Office of the Attorney General
100 N. Carson St.
Carson City, NV 89701

David Creekman
Washoe County District Attorney's Office
Civil Division
P.O. Box 30083
Reno, NV 89520

DATED this 19th day of January, 2011.

/s/ Elaine K. Bates
Employee of Morris Peterson