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Tracie K. Lindeman
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN RE: MANHATTAN WEST MECHANIC'S LIEN
LITIGATION

Supreme Court No.: 61131

District Court Case No. A571228

APCO CONSTRUCTION, INC., a Nevada corporation;
ACCURACY GLASS & MIRROR COMPANY, INC.;
BUCHELE, INC.; BRUIN PAINTING
CORPORATION; CACTUS ROSE CONSTRUCTION;
FAST GLASS, INC.; HD SUPPLY WATERWORKS,
LP; HEINAMAN CONTRACT AND GLAZING;
HELIX ELECTRIC OF NEVADA, LLC; INTERSTATE
PLUMBING & AIR CONDITIONING; SWPPP
COMPLIANCE SOLUTIONS, LLC; WRG DESIGN,
INC.,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT,
COUNTY OF CLARK, STATE OF NEVADA, AND
THE HONORABLE SUSAN W. SCANN, DISTRICT
JUDGE,

Respondents and,

Consolidated with:

08A574391, 08A574792,
08A577623, 09A580889,
09A583289, 09A584730,
09A587168, A-09-589195-C, A-
09-589677-C, A-09-590319-C, A-
09-592826-C, A-09-596924-C,
and A-09-597089-C

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
FILING REPLY BRIEF**

[FIRST REQUEST]

1 SCOTT FINANCIAL CORPORATION, A NORTH
2 DAKOTA CORPORATION; AHERN RENTALS, INC.,
3 ARCH ALUMINUM AND GLASS CO.; ATLAS
4 CONSTRUCTION SUPPLY, INC.; BRADLEY J.
5 SCOTT; CABINETEC, INC.; CELLCRETE
6 FIREPROOFING OF NEVADA, INC.; CAMCO
7 PACIFIC CONSTRUCTION CO., INC.; CLUB VISTA
8 FINANCIAL SERVICES, LLC.; CONCRETE
9 VISIONS, INC.; CREATIVE HOME THEATRE, LLC;
10 CUSTOM SELECT BILLING, INC.; DAVE
11 PETERSON FRAMING, INC.; E&E FIRE
12 PROTECTION, LLC; FERGUSON FIRE AND
13 FABRICATION, INC.; GEMSTONE DEVELOPMENT
14 WEST, INC; GRANITE CONSTRUCTION
15 COMPANY; HARSCO CORPORATION;
16 HYDROPRESSURE CLEANING, INC; INQUIPCO;
17 INSULPRO PROJECTS, INC.; JEFF HEIT
18 PLUMBING, CO., LLC; JOHN DEERE LANDSCAPE,
19 INC.; LAS VEGAS PIPELINE, LLC; NEVADA
20 PREFAB ENGINEERS; NOORDA SHEET METAL
COMPANY; NORTHSTAR CONCRETE, INC; PAPE
MATERIALS HANDLING; PATENT
CONSTRUCTION SYSTEM; PROFESSIONAL DOOR
AND MILL WORKS, LLC; READY MIX, INC.;
RENAISSANCE POOLS & SPA, INC.; REPUBLIC
CRANE SERVICE, LLC; STEEL ENGINEERS, INC.;
SUPPLY NETWORK, INC.; SUNSTATE
COMPANIES, INC.; THARALDSON MOTELS II,
INC.; THE PRESSURE GROUT COMPANY; TRI
CITY DRYWALL, INC.; UINTAH INVESTMENTS,
LLC; WRG DESIGN, INC.; AND ZITTING
BROTHERS CONSTRUCTION, INC.;

Real Parties In Interest.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR FILING REPLY BRIEF
[FIRST REQUEST]**

Petitioners, APCO Construction, Inc., et al. ("Petitioners") hereby move this Court for a 14 day extension of the time for filing the Reply Brief. This is the first request for an extension of the deadline for filing the Reply Brief. The Reply Brief is currently due on April 17, 2013. Therefore, Petitioners request an extension up to and including May 1, 2013.

1 Petitioners have contacted counsel for Respondents Scott Financial Corporation, and the
2 Real Parties in Interest Club Vista Financial Services, LLC and Tharaldson Motels II, Inc., and
3 both have agreed to the Petitioners request for a 14 day extension of the deadline to file the
4 Reply Brief. However, out of an abundance of caution due to the prior stipulations and joint
5 motions of the parties relating to the briefing schedule, Petitioners are submitting this request as
6 an unopposed motion for extension to the Court.

7 Petitioners have been diligently working on the Reply Brief, but need the additional time
8 to complete the brief. Due to the issues of first impression involved in this case, as well as the
9 need to coordinate among several petitioning parties, Petitioners are seeking a fourteen (14) day
10 extension of the deadline for filing the Reply Brief in this matter.

11 This motion is made in good faith and without any intent to delay the completion of
12 briefing or determination of this matter.

13 Dated this 16th day of April 2013.

14 **Howard & Howard Attorneys PLLC**

Sterling Law, LLC

15
16 /s/ Wade Gochmour

/s/ Beau Sterling

17 Gwen Rutar Mullins, Esq.

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CERTIFICATE OF SERVICE

I do hereby certify that on the 16th day of April 2013, a copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME FOR FILING REPLY BRIEF [FIRST REQUEST] was served via this Court's electronic service system to the following:

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CERTIFICATE OF MAILING

I do hereby certify that on the 16th day of April 2013, a copy of the UNOPPOSED MOTION FOR EXTENSION OF TIME FOR FILING REPLY BRIEF [FIRST REQUEST] was served by placing the same to be deposited for mailing in the United States mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, NV to:

The Honorable Susan W. Scann
Department 29, Eighth Judicial District Court
330 S. Third Street
Las Vegas, NV 89101

/s/ Kellie Piet
An employee of Howard & Howard Attorneys PLLC