Marquis Aurbach Coffing Micah S. Echols, Esq. Nevada Bar No. 8437 10001 Park Run Drive 3 Las Vegas, Nevada 89145 Telephone: (702) 382-0711 Facsimile: (702) 382-5816 mechols@maclaw.com Attorneys for Respondent, LVMPD 5 IN THE SUPREME COURT OF THE STATE OF NEVADA 6 BRYAN FERGASON, 7 8 Appellant, 9 VS. 10 LAS VEGAS METROPOLITAN Las Vegas, Nevada 89145 (702) 382-0711 FAX: (702) 382-5816 POLICE DEPARTMENT, 11 Respondent. 12 13 14 15

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62357

Case No.:

Appeal from the Eighth Judicial District Court, The Honorable Douglas E. Smith Presiding

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S ANSWERING BRIEF (First Request)

Respondent, Las Vegas Metropolitan Police Department ("LVMPD"), by and through its counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 45-day extension of time to file LVMPD's answering brief.

LVMPD's answering brief is currently due on May 29, 2014. If the Court grants this request for a 45-day extension, LVMPD's answering brief will be due on July 14, 2014. Good cause exists for allowing LVMPD to extend the filing deadline until July 14, 2014:

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- 1. Lead appellate counsel, Micah S. Echols, Esq., is new to the case and will need additional time to review the case below and all documents filed in the instant appeal and to become familiar with this case.
- Appellant's opening brief was already filed and the time for preparing LVMPD's answering brief was already running when Mr. Echols received the case and filed his notice of appearance.
- 3. Additional time will also be required to review Appellant's appendix to determine whether LVMPD will need to file its own appendix.

Therefore, the Court should extend the current May 29, 2014 filing deadline by 45 days for LVMPD's answering brief to July 14, 2014. This Motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 6th day of May, 2014.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols Micah S. Echols, Esq. Nevada Bar No. 8437 10001 Park Run Drive Las Vegas, Nevada 89145 Attorneys for Respondent, LVMPD

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S ANSWERING BRIEF was filed electronically with the Nevada Supreme Court on the 6th day of May, 2014. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Ryan Daniels, Esq.

I further certify that I served a copy of this document by emailing a true and correct copy thereof, addressed to:

> Thomas J. Moreo, Esq. Chief Deputy District Attorney Clark County District Attorney 200 Lewis Ave., 3rd Floor Las Vegas, NV 89155 (thomas.moreo@clarkcountyda.com) Co-counsel for Respondent, LVMPD

> > /s/ Leah Dell Leah Dell, an employee of Marquis Aurbach Coffing