IN THE SUPREME COURT OF THE STATE OF NEVADA

VILLAGE LEAGUE TO SAVE INCLINE ASSETS, INC.; et al., Appellants,) Supreme Court Case No. 63381 Electronically Filed) Feb 12 2014 09:26 a.m.) District Court NoT GY 103 1060 Indeman) Clerk of Supreme Court
VS.)
THE STATE OF NEVADA, BOARD OF EQUALIZATION; et al.,)
Respondents.))

MOTION FOR EXTENSION OF TIME

The Village League appellants move the Court to extend the time for filing reply briefs in this matter to and including March 17, 2014. This motion is made and based on the declaration of Village League counsel attached as Exhibit 1 and the stipulation of counsel for all parties attached as Exhibit 2. This will be the first extension of time on the reply briefs of the Village League appellants and the second extension for the Bakst appellants. This extension of time will allow all the briefs to be filed on the same day.

Respectfully submitted this 11th day of February, 2014.

SNELL & WILMER by Suellen Fulstone, Bar No. 161 Attorneys for Village League Appellants

CERTIFICATE OF SERVICE

This document was filed electronically with the Nevada Supreme Court on

February 11, 2014. Electronic service of this document shall be made in

accordance with the Service List as follows:

Dawn Buoncristiani Office of the Attorney General 100 North Carson St. Carson City, NV 89701

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

Norman J. Azevedo 405 N. Nevada Street Carson City, NV 89703

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EXHIBIT 1

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IN THE SUPREME COURT OF THE STATE OF NEVADA

VILLAGE LEAGUE TO SAVE INCLINE) Supreme Court Case No. 63581
ASSETS, INC.; et al.,)
) District Court No. CV03-06922
Appellants,)
)
VS.)
)
THE STATE OF NEVADA, BOARD)
OF EQUALIZATION; et al.,)
)
Respondents.)
)

DECLARATION OF SUELLEN FULSTONE IN SUPPORT OF MOTION FOR AN EXTENSION OF TIME FOR FILING REPLY BRIEF

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

1. I am an attorney duly licensed to appear in the courts of the State of Nevada and am employed part-time with the law firm of Snell & Wilmer, counsel for the Village League appellants in the appeal captioned "*Village League to Save Incline Assets, Inc. v. The State Board of Equalization, et al.*," Appeal No. 63581 in the Nevada Supreme Court.

2. I prepared the opening brief for the Village League appellants and am primarily responsible for the preparation of the reply briefs in the above-identified appeal. The reply of the Village League appellants to the State Board of Equalization Answering Brief is presently due on February 14, 2014. The reply of the Village League appellants to the Washoe County Answering Brief is presently due on February 18, 2014.

3. I have been transitioning from my legal practice to a new late-life career as a teacher. In January of 2014, I accepted an opportunity to teach two days a week at O'Brien Middle School in Reno, Nevada. I limited my initial involvement to two days a week in order to give myself time to prepare the reply briefs in this matter. For a couple of weeks, however, the teaching requirement went to 5 days a week and is now at 3 days a week. Because of the additional time required by the teaching job, I am required to seek an extension on the reply briefs.

4. When I requested the agreement of counsel for the other parties to this appeal to an extension of time to March 17, 2014, we all agreed that the time for the Bakst appellants to file their reply brief would be similarly extended and that the Village League appellants would file a single reply brief to both the SBOE and County Answering Briefs.

5. If the requested extension is granted, all reply briefs will be due on the same day, March 17, 2014, and the appeal will be fully briefed at that time.

Dated this 11th day of February, 2014.

Suellen Fulstone, Bar No. 1615

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EXHIBIT 2

EXHIBIT 2

IN THE SUPREME COURT OF THE STATE OF NEVADA

VILLAGE LEAGUE TO SAVE INCLINE) Supreme Court Case No. 63581 ASSETS, INC.; et al.,

Appellants,

vs.

THE STATE OF NEVADA, BOARD OF EQUALIZATION; et al.,

Respondents.

) District Court No. CV03-06922

STIPULATION FOR EXTENSION OF TIME **TO FILE REPLY BRIEFS**

Appellants and Respondents recite as follow: There are two groups of appellants in this case and three different due dates for reply briefs. The Bakst appellants' reply brief is due on February 24, 2014, after one extension of 28 days. The Village League appellants' reply to the SBOE Answering Brief is due on February 14, 2014. The Village League appellants' reply to the County Answering Brief is due on February 18, 2014. Counsel for the Village League appellants asked counsel for the other parties to extend the date for filing the reply briefs by 30 days to accommodate counsel's teaching commitment. Counsel for Appellants and Respondents have now agreed to a single reply date for all three reply briefs of March 17, 2014.

Accordingly, counsel, on behalf of their respective parties, stipulate and ask the Court to approve an extension of time to, and including, March 17, 2014 for the filing of all reply briefs in this matter. This would be the second extension of time for the Bakst appellants' reply brief for a total of 49 days and the first extension of time for the Village League appellants' reply briefs for a total of 31 days on the reply to the SBOE and 27 days for the reply to the County. No other extensions of time on the reply briefs have been sought.

Counsel for the Village League appellants further agrees and stipulates to filing a single reply brief to both the SBOE and County answering briefs.

Dated: <u>2 - //-/4</u> SNELL & WILMER L.L.P.

Suellen Fulstone (Bar #1615)

Attorney for League Appellants

Dated:_____

Dated: 2-(0-14

Norman J. Azevedo (Bar #3204) Attorney for Bakst Appellants

Dated:_____

Catherine Cortez Mastro Attorney General Dawn Buoncristiani (Bar #7771) Deputy Attorney General Attorney for the State of Nevada ex rel. State Board of Equalization

Richard Gammick Washoe County District Attorney Herbert Kaplan (Bar #7395) Deputy District Attorney Attorney for Washoe County, Washoe County Treasurer, Washoe County Assessor Accordingly, counsel, on behalf of their respective parties, stipulate and ask the Court to approve an extension of time to, and including, March 17, 2014 for the filing of all reply briefs in this matter. This would be the second extension of time for the Bakst appellants' reply brief for a total of 49 days and the first extension of time for the Village League appellants' reply briefs for a total of 31 days on the reply to the SBOE and 27 days for the reply to the County. No other extensions of time on the reply briefs have been sought.

Counsel for the Village League appellants further agrees and stipulates to filing a single reply brief to both the SBOE and County answering briefs.

Dated:______SNELL & WILMER L.L.P.

Dated:_____

Suellen Fulstone (Bar #1615) Attorney for League Appellants

Dated:

Norman J. Azevedo (Bar #3204) Attorney for Bakst Appellants

Dated: 2/10/14

Richard Gammick Washoe County District Attorney Herbert Kaplan (Bar #7395) Deputy District Attorney Attorney for Washoe County, Washoe County Treasurer, Washoe County Assessor

Catherine Cortez Mastro Attorney General Dawn Buoncristiani (Bar #7771) Deputy Attorney General Attorney for the State of Nevada ex rel. State Board of Equalization Accordingly, counsel, on behalf of their respective parties, stipulate and ask the Court to approve an extension of time to, and including, March 17, 2014 for the filing of all reply briefs in this matter. This would be the second extension of time for the Bakst appellants' reply brief for a total of 49 days and the first extension of time for the Village League appellants' reply briefs for a total of 31 days on the reply to the SBOE and 27 days for the reply to the County. No other extensions of time on the reply briefs have been sought.

Counsel for the Village League appellants further agrees and stipulates to filing a single reply brief to both the SBOE and County answering briefs.

Dated:______SNELL & WILMER L.L.P.

Dated:_____

Suellen Fulstone (Bar #1615) Attorney for League Appellants

Norman J. Azevedo (Bar #3204) Attorney for Bakst Appellants

Dated: $2 - 10 \cdot 14$

Dated:_____

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Catherine Cortez Mastro Attorney General Dawn Buoncristiani (Bar #7771) Deputy Attorney General Attorney for the State of Nevada ex rel. State Board of Equalization Richard Gammick Washoe County District Attorney Herbert Kaplan (Bar #7395) Deputy District Attorney Attorney for Washoe County, Washoe County Treasurer, Washoe County Assessor