IN THE SUPREME COURT OF THE STATE OF NEVADA

ASSETS, INC.; et al.,) Supreme Court Case No. 63581 Electronically Filed) Mar 11 2014 04:26 p.m) District Court NoTa∀63406212deman
Appellants,) Clerk of Supreme Court)
vs.	
THE STATE OF NEVADA, BOARD	
OF EQUALIZATION; et al.,	
Respondents.	

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

The Village League appellants move the Court to extend the time for filing reply briefs in this matter for an additional nine (9) days to and including March 26, 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 second extension of time on the reply briefs of the Village League appellants and the third 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 March, 2014.

Suellen Fulstone, Bar No. 161

SNELL & WILMER

Áttorneys for Village League Appellants

CERTIFICATE OF SERVICE

This document was filed electronically with the Nevada Supreme Court on March 11, 2014. Electronic service of this document shall be made in accordance with the Service List as follows:

Helly W. Longe

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

Herb Kaplan 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

EXHIBIT 1

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 brief in the above-identified appeal. That reply brief is presently due on March 17, 2014. The reply brief of the Bakst appellants is also due on March 17, 2014.

- 3. In the process of transitioning from my legal practice to a career as a teacher, I have continued to find it difficult to find the blocks of time necessary to research and draft the reply brief in this matter. I have now taken a hiatus from teaching so that I can focus on and complete the brief. My next scheduled teaching date is March 27, 2014. On behalf of the Village League appellants, I am seeking an additional nine-day extension on the reply brief to March 26, 2014. That would be the second extension for a total of 50 days on the reply to the SBOE Answering Brief and 36 days on the reply to the County Answering Brief.
- 4. All counsel have agreed that the time for the Bakst appellants to file their reply brief would be similarly extended. Counsel previously agreed and have stipulated that the Village League appellants will file a single reply brief to both the SBOE and County Answering Briefs.
- 5. If the requested extension is granted, both reply briefs will be due on the same day, March 26, 2014, and the appeal will be fully briefed at that time.

Dated this 11th day of March, 2014.

Suellen Fulstone, Bar No. 1615

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.,	
) District Court No. CV03-06922
Appellants,)
)
VS.)
)
THE STATE OF NEVADA, BOARD	
OF EQUALIZATION; et al.,)
)
Respondents.)
)

STIPULATION FOR EXTENSION OF TIME TO FILE REPLY BRIEFS

The Bakst appellants and Village League appellants request an additional nine days to file their reply brief in the above-referenced matter. The current due date for the reply briefs is March 17, 2014. Counsel, on behalf of their respective parties, stipulate and ask the Court to approve an extension of time to, and including, March 26, 2014, for the filing of reply briefs in this matter. This would be the third extension of time for the Bakst appellants' reply brief for a total of 58 days and the second extension of time for the Village League appellants' reply briefs for a total of 50 days on the reply to the SBOE and 36 days for the reply to the County. No extensions of time on the reply briefs have been denied.

This extension is requested to accommodate certain personal issues of

counsel for the Village League appellants as more fully set forth in the Application

for Extension of Time and supporting declaration.		
Dated: 3/1/14 SNELL & WILMER L.L.P.	Dated: 3-10-14	
Suellen Fulstone (Bar #1615) Attorney for League Appellants	Norman J. Azevedo (Bar #3204) Attorney for Bakst Appellants	
Dated:	Dated:	
Catherine Cortez Mastro	Richard Gammick	
Attorney General	Washoe County District Attorney	
Dawn Buoncristiani (Bar #7771)	Herbert Kaplan (Bar #7395)	
Deputy Attorney General	Deputy District Attorney	
Attorney for the State of Nevada	Attorney for Washoe County, Washoe	
ex rel. State Board of Equalization	County Treasurer, Washoe County	

Deputy District Attorney
Attorney for Washoe County, Washoe
County Treasurer, Washoe County Assessor

counsel for the Village League appellants as more fully set forth in the Application for Extension of Time and supporting declaration. Dated: Dated: SNELL & WILMER L.L.P. Suellen Fulstone (Bar #1615) Norman J. Azevedo (Bar #3204) Attorney for League Appellants Attorney for Bakst Appellants Dated: 3-10-19 Dated: Catherine Cortez Mastro Richard Gammick Attorney General Washoe County District Attorney Dawn Buoncristiani (Bar #7771) Herbert Kaplan (Bar #7395) Deputy Attorney General Deputy District Attorney Attorney for the State of Nevada Attorney for Washoe County, Washoe ex rel. State Board of Equalization County Treasurer, Washoe County

Assessor

counsel for the Village League appellants as more fully set forth in the Application for Extension of Time and supporting declaration.

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:	Dated: March 10,2014
Catherine Cortez Mastro	Richard Gammick
Attorney General	Washoe County District Attorney
Dawn Buoncristiani (Bar #7771)	Herbert Kaplan (Bar #7395)
Deputy Attorney General	Deputy District Attorney
Attorney for the State of Nevada	Attorney for Washoe County, Washoe
ex rel. State Board of Equalization	County Treasurer, Washoe County