

IN THE SUPREME COURT OF THE STATE OF NEVADA

VILLAGE LEAGUE TO SAVE INCLINE	)	Supreme Court Case No. 63581
ASSETS, INC.; et al.,	)	Electronically Filed
	)	Apr 02 2014 04:47 p.m.
	)	District Court No. 13-00012
Appellants,	)	Trevor R. Endeman
	)	Clerk of Supreme Court
vs.	)	
	)	
THE STATE OF NEVADA, BOARD	)	
OF EQUALIZATION; et al.,	)	
	)	
Respondents.	)	
_____	)	

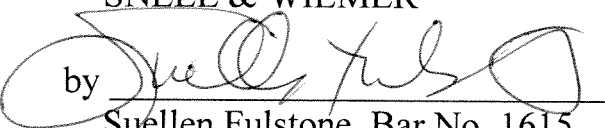
**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF  
(FOURTH REQUEST)**

The Village League appellants move the Court to extend the time for filing their reply brief in this matter for an additional five (5) days to and including Monday, April 7, 2014. The reply brief is presently due on April 2, 2014. This motion is based on the grounds set forth in the declaration of counsel attached as Exhibit 1. Counsel for respondents have been advised of this request for an additional brief extension of time. *See* Exhibit 2. This will be the fourth extension of time on the reply brief of the Village League appellants for a total of 52 days.

Respectfully submitted this 2nd day of April, 2014.

SNELL & WILMER

by

  
Suellen Fulstone, Bar No. 1615

Attorneys for Village League Appellants

## **CERTIFICATE OF SERVICE**

This document was filed electronically with the Nevada Supreme Court on April 2, 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

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

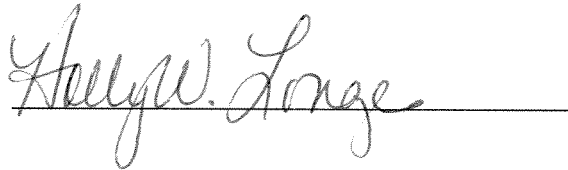
A handwritten signature in cursive script, reading "Holly W. Longe", is written over a horizontal line.

EXHIBIT 1

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 26, 2014.

3. I anticipated being able to complete the brief by the current due date,

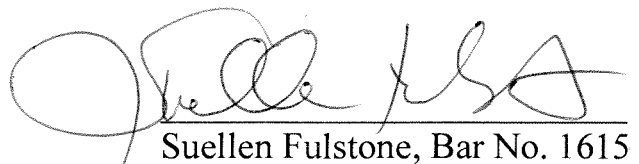
April 2, 2014, by working through the weekend. However, I have a small band of sheep and, last Friday afternoon, I had a ewe deliver prematurely. I spent the weekend trying to keep this little premie alive -- feeding every two hours, treating pneumonia, etc. As a result I was unable to work on the brief or even get any sleep for that matter. The lamb died Monday morning, so I lost the lamb in addition to three days of work on the brief. I was hoping that I could still get the brief finalized by today, but that proved impossible.

4. On behalf of the Village League appellants, I am seeking an additional five-day extension on the reply brief to April 7, 2014. That would be the fourth extension for a total of 52 days. That amount of additional time is not unreasonable. The Bakst appellants obtained extensions totaling 58 days.

5. Counsel for the Bakst appellants and for respondents have been advised of this request for extension. I do not believe that there will be any opposition to this brief amount of additional time.

6. If the requested extension is granted, the reply brief will be due on April 7, 2014, and the appeal will be fully briefed at that time.

Dated this 2nd day of April, 2014.



Suellen Fulstone, Bar No. 1615

# EXHIBIT 2

## Longe, Holly

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**From:** Fulstone, Suellen  
**Sent:** Wednesday, April 02, 2014 1:18 PM  
**To:** Longe, Holly  
**Subject:** FW: My LAST LAST extension

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From: Fulstone, Suellen  
Sent: Wednesday, April 02, 2014 1:16 PM  
To: [DBuoncristiani@ag.nv.gov](mailto:DBuoncristiani@ag.nv.gov); [hkaplan@da.washoecounty.us](mailto:hkaplan@da.washoecounty.us); [norm@nevadataxlawyers.com](mailto:norm@nevadataxlawyers.com)  
Subject: My LAST LAST extension

Counsel -- Remind me never to promise absolutes -- life always gets in the way -- As I believe you all know, I have a few sheep -- I regularly lamb in the second week of April -- weather is warmer then -- but last Friday afternoon, I had a ewe deliver prematurely. I spent the weekend trying to keep this little premie alive -- feeding every two hours, treating pneumonia, etc. -- upshot -- no sleep and no work on the brief either -- Lamb died Monday morning -- I lost the lamb and three days of work on the brief. I was hoping that I could still get the brief finalized by today -- but even if my secretary and I work until midnight, I don't think we can do it -- I would ask for just one additional day but I hope I have learned my lesson on that -- I am going to ask for until Monday -- I will have it filed sooner barring emergency interruptions --

I will email copies of the final brief as submitted to the court to each of you without waiting for it to be placed on the docket --

Thanks, as always, for your professional consideration.

Suellen Fulstone