

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

**JOHN AND MELISSA FRITZ,**

Appellants,

v.

**WASHOE COUNTY,**

Respondent,

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Electronically Filed  
Aug 21 2015 03:29 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
Case No. 67660

**JOINT MOTION FOR EXTENSION OF TIME**  
**TO FILE ANSWERING BRIEF**

The parties jointly move this Court for a three-week extension of time for Washoe County to file and serve its answering brief. Currently, the County's answering brief is due August 28, 2015. If the Court grants this request, the County's brief will be due no later than September 18, 2015. This is the first motion, under NRAP 31(b)(3), for an extension of time to file the answering brief. The parties previously stipulated, under NRAP 31(b)(2), to a 30-day extension of time.

In addition to the relatively short extension requested and this being the first motion for an extension of time, the primary reason for this request is that this case was only recently assigned to counsel Stephan Hollandsworth in the District Attorney's Office, who appears in this matter on behalf of the County by virtue of the concurrently filed Notice of Appearance. Mr. Hollandsworth will be taking over the primary drafting of the County's brief. The additional time is necessary for Mr. Hollandsworth to familiarize himself with this case, including the extensive joint appendix and the important inverse-condemnation issues this case raises.

Moreover, counsel for Appellants, the Fritzes, does not oppose the requested extension and, correspondingly, joins this motion. Therefore, given the relatively short extension requested, that this is the first motion for an extension of time to file the answering brief, that counsel Mr. Hollandsworth is new to this case, the extensive joint appendix, the significant issues this case raises, and that the Fritz's counsel joins this motion, it is requested that this Court grant the motion and extend the County's deadline to file the answering brief to September 18, 2015.

CHRISTOPHER J. HICKS  
Washoe County District Attorney

Dated 8/21/2015

By /s/ Stephan Hollandsworth  
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ATTORNEYS FOR WASHOE COUNTY

Dated 8/21/2015

/s/ Luke A. Busby  
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ATTORNEY FOR APPELLANTS

### **CERTIFICATE OF SERVICE**

Pursuant to NRAP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years, and not a party to nor interested in the within action. I certify that on this date, the foregoing was electronically filed with the Supreme Court of the State of Nevada by using the ECF System. Electronic service of the foregoing document shall be made in accordance with the Court's service list as follows:

Luke A. Busby, Esq.

Michael W. Large, Deputy D.A.

Dated this 21st day August, 2015.

/s/ C. Mendoza

C. Mendoza