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

FORD MOTOR COMPANY,

Appellant,,

v.

THERESA GARCIA TREJO,

Respondent.

Supreme Court Case No. 67843
Electronically Filed
District Court Case No. 2016-124059-0.
Jan 05 2016 12:04 PM
Tracie K. Lindeman
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR FILING
RESPONDENT’S ANSWERING BRIEF**

Pursuant to NRAP 26(b) and 31(b)(3), Respondent Theresa Garcia Trejo requests a 14-day extension of time, up to and including January 25, 2016, in which to file her answering brief. The parties previously stipulated to one 30-day extension, which extended the original deadline to the current deadline of January 11, 2016. Attached hereto as Exhibit 1 is the declaration of counsel for Respondent, David N. Frederick, Esq., setting forth why the extension is needed. Counsel for Appellant has no opposition to this requested extension. *Id.* at ¶ 8. Based on the declaration of Mr. Frederick, good cause exists for the requested 14-

1 day extension, and Respondent respectfully requests the Court grant the 14-day
2 extension.

3 Dated this 5th day of January 2016.

4 MAUPIN • NAYLOR • BRASTER
5 A. William Maupin (NBN 1315)
6 John M. Naylor (NBN 5435)
7 Jennifer L. Braster (NBN 9982)

8 NETTLES LAW FIRM

9 Brian D. Nettles (NBN 3660)

10 William R. Killip, Jr. (NBN 7462)

11 GARCIA OCHOA MASK

12 Ricardo A. Garcia (*Pro Hac Vice*)

13 Jody R. Mask (*Pro Hac Vice*)

14 LAWRENCE LAW FIRM

15 Larry Wayne Lawrence (*Pro Hac Vice*)

16 DAVID N. FREDERICK (NBN 1548)

17 By: /s/ A. William Maupin

18 A. William Maupin

19 MAUPIN • NAYLOR • BRASTER

20 1050 Indigo Drive, Suite 112

21 Las Vegas, NV 89145

22 *Attorneys for Respondent Theresa Garcia*
23 *Trejo*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Maupin • Naylor • Braster and that
3 on the 5th day of January 2016, I electronically filed and served a true and correct
4 copy of the above and foregoing **UNOPPOSED MOTION FOR EXTENSION**
5 **OF TIME FOR FILING RESPONDENT'S ANSWERING BRIEF** to be served
6 as follows:

7 [X] by depositing same for mailing in the United States Mail, in a sealed
8 envelope addressed to:

9 Lisa Perrochet
10 Emily V. Cuatto
11 Horvitz & Levy LLP
12 15760 Ventura Blvd., 18th Floor
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13 Michael W. Eady
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19 Larry W. Lawrence, Jr.
20 Lawrence Law Firm
21 3112 Windsor Road, Suite A234
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Attorneys for Respondent Theresa Garcia Trejo

22 [X] by the Court's CM/ECF system which will send notification to the
23 following:

24 Vaughn A. Crawford
25 Jay J. Schuttert
26 Morgan T. Petrelli
27 Snell & Wilmer LLP
3883 Howard Hughes Parkway, Suite 1100
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Attorneys for Appellant Ford Motor Company

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Attorneys for Respondent Theresa Garcia Trejo

/s/ Amy Reams
An Employee of MAUPIN • NAYLOR • BRASTER

EXHIBIT 1

DECLARATION OF DAVID N. FREDERICK

1
2 1. I am David N. Frederick, Esq., and I am an attorney of record for
3 Respondent Theresa Garcia Trejo (“Respondent”) in the matter of *Ford Motor*
4 *Company v. Trejo*, Case No. 67843, on appeal before the Nevada Supreme Court.
5 This declaration is based on my personal knowledge.

6 2. This declaration is made in support of Respondent’s Motion for
7 Extension of Time for Filing Respondent’s Answering Brief (“Motion to Extend”)
8 seeking an extension until January 25, 2016.

9 3. The due date for this brief has been extended once, for a period of
10 thirty days, by stipulation of the parties. Currently, Respondent’s Answering Brief
11 is due on January 11, 2016.

12 4. I am the attorney principally responsible for researching and drafting
13 Respondent’s Answering Brief.

14 5. This is an appeal from a judgment on a jury verdict in a wrongful
15 death products liability action involving a great deal of highly intensive expert
16 witness testimony.

17 6. In addition, Appellant Ford Motor Company and its *Amici Curiae*, the
18 National Association of Manufacturers and the Alliance of Automobile
19 Manufacturers, seek a major change in Nevada products liability law that is highly
20 controversial and which has been the subject of quite a number of law review
21 articles and which has received a wide variety of responses from courts around the
22 country when this and related issues have been presented to them.

23 7. I have been diligently engaged in the research and drafting of
24 Respondent’s Answering Brief and portions of that brief have been and are in the
25 process of being drafted. However, the holidays and other personal and family
26 matters extending into the New Year have and will prevent additional research and
27 the completion of review, revision, and approval of the brief in time for filing by
28

1 the present due date, January 11, 2016. I presently believe that it will be possible to
2 complete research, preparation, review, revision, and approval of the brief in time
3 for filing by the new due date sought in this motion, January 25, 2016.

4 8. Counsel for Appellant has no opposition to this requested extension
5 until January 25, 2016.

6 9. This extension is not sought for purposes of delay and solely because,
7 in my opinion, as an officer of the Court, the extension sought is necessary to fully
8 and properly brief the Court on the issues presented in this appeal.

9 10. I declare under penalty of perjury that the forgoing is true and correct.

10 Dated this 5th of January 2016.

11 /s/ David N. Frederick
12 DAVID N. FREDERICK

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