

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

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Tracie K. Lindeman
Clerk of Supreme Court

FORD MOTOR COMPANY,

Appellant,

v.

THERESA GARCIA TREJO

Respondent.

Supreme Court Case No. 67843

APPEAL FROM THE EIGHTH JUDICIAL DISTRICT, COUNTY OF CLARK
THE HONORABLE VALERIE ADAIR,, DISTRICT JUDGE
DISTRICT COURT CASE NO. A-11-641059-C

**UNOPPOSED MOTION FOR 14-DAY EXTENSION OF
TIME FOR FILING APPELLANT'S REPLY BRIEF**

HORVITZ & LEVY LLP
LISA PERROCHET (*PRO HAC VICE*)
EMILY V. CUATTO (*PRO HAC VICE*)
15760 VENTURA BOULEVARD, 18TH FLOOR
ENCINO, CALIFORNIA 91436
(818) 995-0800 • FAX: (818) 995-3157
lperrochet@horvitzlevy.com
ecuatto@horvitzlevy.com

SNELL & WILMER L.L.P.
VAUGHN A. CRAWFORD (SBN 7665)
JAY J. SCHUTTERT (SBN 8656)
MORGAN T. PETRELLI (SBN 13221)
3883 HOWARD HUGHES PARKWAY, SUITE 1100
LAS VEGAS, NEVADA 89169
(702) 784-5200 • FAX: (702) 784-5252
vcrawford@swlaw.com
jschutttert@swlaw.com
mpetrelli@swlaw.com

THOMPSON COE COUSINS & IRONS, L.L.P.
MICHAEL W. EADY (*PRO HAC VICE*)
701 BRAZOS STREET, 15TH FLOOR
AUSTIN, TEXAS 78701
(512) 708-8200 • FAX: (512) 708-8777
meady@thompsoncoe.com

ATTORNEYS FOR APPELLANT
FORD MOTOR COMPANY

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

FORD MOTOR COMPANY,
Appellant,
v.
THERESA GARCIA TREJO
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Pursuant to NRAP 26(b) and 31(b)(3), Appellant Ford Motor Company requests an extension of 14 days, until April 11, 2016, within which to file the appellant’s reply brief in this matter. The parties previously stipulated to one 30-day extension, pursuant to which the reply brief is currently due on March 28, 2016. This motion is based on the accompanying declaration of Emily V. Cuatto, which explains the reasons the extension is needed. Good cause exists

for a two-week extension. (Declaration of Emily V. Cuatto, ¶¶ 4–6.) Plaintiff does not oppose the extension. (*Id.* ¶ 3.) Appellant therefore respectfully requests the Court grant the requested extension.

Dated: March 24, 2016

HORVITZ & LEVY LLP

LISA PERROCHET (*Pro Hac Vice*)

EMILY V. CUATTO (*Pro Hac Vice*)

SNELL & WILMER L.L.P.

VAUGHN A. CRAWFORD (Nevada SBN 7665)

JAY J. SCHUTTERT (Nevada SBN 8656)

MORGAN T. PETRELLI (Nevada SBN 13221)

THOMPSON COE COUSINS & IRONS, L.L.P.

MICHAEL W. EADY (*Pro Hac Vice*)

By: s/ Emily V. Cuatto

Emily V. Cuatto

Horvitz & Levy LLP

15760 Ventura Blvd., 18th Floor

Encino, California 91436

By: s/ Jay J. Schuttert

Jay J. Schuttert

Snell & Wilmer L.L.P.

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89169

Attorneys for Appellant

FORD MOTOR COMPANY

DECLARATION OF EMILY V. CUATTO

I, Emily V. Cuatto, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and am an associate with the firm of Horvitz & Levy LLP, *Pro Hac Vice* of record for appellant Ford Motor Company. I am one of the attorneys primarily responsible for preparing the appellant's reply brief in this case.

2. Based on the facts in this declaration, I request a 14-day extension of time to file the appellant's reply brief. Pursuant to a previous stipulation for extension of time, the appellant's reply brief is currently due on March 28, 2016. If the court grants this motion for a 14-day extension of time, the reply brief will be due on April 11, 2016.

3. I have communicated with William Maupin, counsel for respondent, Theresa Garcia-Trejo. Respondent does not oppose this motion.

4. My client Ford Motor Company has requested we seek an extension and accordingly has no objection to this motion.

5. I have been working diligently to prepare the appellant's reply brief since the answering brief was filed on January 26, 2016. Additionally, I have been working diligently to respond to the Nevada Justice Association's amicus brief, which was accepted for filing on March 1, 2016. Rather than filing a separate response to the Nevada Justice Association's amicus brief, I have been working to prepare a single reply brief in response to both the answering brief and the amicus brief. Because a central issue in this appeal is one of first impression in Nevada, and the answering brief and amicus brief therefore cite a wide variety of authorities from other jurisdictions, preparing the reply brief has involved a substantial investment of time for research and analysis.

6. Although I have now completed a draft of the reply brief, due to my client's unexpectedly heavy internal workload and spring schedule, I will reasonably require some additional time for my client to review, comment on, and approve the brief, and to then revise the brief accordingly and put it into a form suitable for presentation to this Court.

7. This application is made in good faith for the reasons set forth above and not for the purpose of delay. I know of no prejudice that would result to respondent by the granting of the requested extension.

I declare under penalty of perjury under Nevada law that the foregoing is true and correct and that this declaration was executed on March 24, 2016, at Encino, California.

s/ Emily V. Cuatto

Horvitz & Levy LLP
15760 Ventura Blvd., 18th Floor
Encino, California 91436

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 15760 Ventura Boulevard, 18th Floor, Encino, California 91436-3000.

On March 24, 2016, I served true copies of the following document(s) described as **UNOPPOSED MOTION FOR 14 DAYS EXTENSION OF TIME FOR FILING APPELLANT'S REPLY BRIEF** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the indicated persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Horvitz & Levy LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY ELECTRONIC TRANSMISSION: Based on electronic transmission via the Nevada Supreme Court's Appellate Case Management System (ACMS) indicated as follows on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 24, 2016, at Encino, California.

s/ Robyn Whelan

SERVICE LIST

Trejo v. Ford Motor Company
Nevada Supreme Court No. 67843

Attorneys	Party(s) Represented
Jay J. Schuttert Morgan T. Petrelli Snell & Wilmer LLP 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169	Appellant <i>Ford Motor Company</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
Vaughn A. Crawford Snell & Wilmer LLP 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169	Appellant <i>Ford Motor Company</i> Hard copy, via U.S. Mail
Michael W. Eady Thompson Coe Cousins & Irons, LLP 701 Brazos Street, 15th Floor Austin, Texas 78701	Appellant <i>Ford Motor Company</i> Hard copy, via U.S. Mail
Brian D. Nettles William R. Killip, Jr. Nettles Law Firm 1389 Galleria Drive, Suite 200 Henderson, Nevada 89014	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
Ricardo A. Garcia Jody R. Mask Garcia Ochoa Mask 820 South Main Street McAllen, Texas 78501	Respondent <i>Teresa Garcia Trejo</i> Hard copy, via U.S. Mail
Larry W. Lawrence, Jr. Lawrence Law Firm 3112 Windsor Road, Suite A234 Austin, Texas 78703	Respondent <i>Teresa Garcia Trejo</i> Hard copy, via U.S. Mail

A. William Maupin, Esq. Jennifer L. Braster Naylor & Braster 1050 Indigo Drive, Suite 112 Las Vegas, Nevada 89145	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
David N. Frederick, Esq. 43 Innisbrook Avenue Las Vegas, Nevada 89113	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Beau Sterling Sterling Law, LLC 228 South 4th Street, 1st Floor Las Vegas, Nevada 89101	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Dennis L. Kennedy Sarah E. Harmon Bailey ♦ Kennedy 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302	<i>Amicus Curiae</i> <i>The National Association of</i> <i>Manufacturers and Alliance of Automobile</i> <i>Manufacturers, Inc.</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Victor E. Schwartz Shook, Hardy & Bacon L.L.P. 1155 F Street, N.W., Suite 200 Washington, DC 20004-1305	<i>Amicus Curiae</i> <i>The National Association of</i> <i>Manufacturers and Alliance of Automobile</i> <i>Manufacturers, Inc.</i> Hard copy, via U.S. Mail
Robert T. Eglet Erica D. Entsminger Eglet Prince 400 South Seventh Street, 4th Floor Las Vegas, Nevada 89101	<i>Amicus Curiae</i> <i>Nevada Justice Association</i> Hard copy, via U.S. Mail

Matthew L. Sharp Matthew L. Sharp, Ltd. 432 Ridge Street Reno, Nevada 89501	<i>Amicus Curiae</i> <i>Nevada Justice Association</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
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