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let alone an emergency. The need for Adelson's deposition has nothing to do with their sought-after writ, once again rehashing claims of bias in an attempt to dislodge the presiding trial judge, in the hopes of delaying this case once again.

This action is nearly six years old. The trial date has finally been fixed for June 27, 2016. Petitioners have made clear their intent to scuttle that trial date by any means necessary. The present petition is simply the latest installment. Petitioners face no irreparable harm from Adelson having to appear at long last and give testimony under oath regarding the merits of this case, something that he has been avoiding for nearly five years now. A stay can only be sought upon a clear showing that (1) the object of the writ petition will be defeated if the stay is denied; (2) it will suffer irreparable or serious injury if the stay is denied; (3) the Real Party in Interest will not suffer irreparable harm if the stay is granted; and (4) Petitioners are likely to prevail on the merits of the writ petition. NRAP 8(c). Confirming that it cannot satisfy this criteria, the Petitioners do not even attempt to do so.

Their proposed writ petition has nothing to do with Adelson's properly scheduled deposition. Having to provide sworn testimony under oath hardly constitutes harm, let alone that which could be labeled "irreparable" under anyone's definition. Rather, the party harmed would be Jacobs, since such a stay would inevitably sabotage the remaining discovery schedule and the upcoming trial date.

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1 This Court has repeatedly emphasized that discovery rulings do not constitute
2 a basis for writ relief. *Valley Health Sys., LLC v. Eighth Jud. Dist. Ct.*, 127 Nev.
3 Adv. Op. 15, 252 P.3d 676, 678 (2001). Only orders which constitute "blanket
4 discovery orders with no regard to relevance, and discovery orders compelling
5 disclosure of privileged information" implicate matters warranting writ review. *Id.*
6 Respectfully, the deposition of the principal defense witness in the case does not
7 raise any such issues.

8 DATED this 24th day of February, 2016.

9 PISANELLI BICE PLLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 24th day of February, 2016, I electronically filed and served a true and correct copy of the above and foregoing **OPPOSITION TO EMERGENCY MOTION UNDER NRAP 27(e) TO STAY ALL PROCEEDINGS IN THE DISTRICT COURT PENDING DECISION ON WRIT PETITION RE ORDERS DENYING MOTION TO DISQUALIFY JUDGE ELIZABETH GONZALEZ WITHOUT A HEARING –RELIEF NEED ON OR BEFORE FEBRUARY 24, 2016** properly addressed to the following:

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SERVED VIA HAND-DELIVERY ON 02/24/16

The Honorable David Barker
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Regional Justice Center
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The Honorable Elizabeth Gonzalez
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/s/ Shannon Thomas
An employee of PISANELLI BICE PLLC