

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3 PUBLIC EMPLOYEES
4 RETIREMENT SYSTEM, a public
5 agency, a public entity and component
6 of the State of Nevada,

7 Appellant,

8 vs.

9 SHAE E. GITTER, an individual, and
10 JARED SHAFER, as Special
11 Administrator of the Estate of Kristine
12 Jo Freshman,

13 Respondents.

14 W. CHRIS WICKER;
15 WOODBURN AND WEDGE,

16 Petitioners,

17 vs.

18 THE EIGHTH JUDICIAL TRIAL
19 COURT FOR THE STATE OF
20 NEVADA, IN AND FOR THE
21 COUNTY OF CLARK, AND THE
22 HONORABLE JIM CROCKETT,

23 Respondents,

24 SHAE E. GITTER; JARED
25 SHAFER,

26 Real Parties in Interest.

Electronically Filed
Aug 10 2016 08:50 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

No. 69208 and 69939

Appeal from the Eighth Judicial
Trial court, Clark County,
Case No. A697642

No. 69961

Appeal from the Eighth Judicial
Trial court, Clark County,
Case No. A697642

27 **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

28 Appellant, PUBLIC EMPLOYEES RETIREMENT SYSTEM, and

Petitioners, W. CHRIS WICKER and WOODBURN AND WEDGE, by and

1 through their attorneys of record, Woodburn and Wedge, move this Court
2 pursuant to NRAP 26, NRAP 27, and NRAP 31(b) for an order extending the
3 time in which Appellant and Petitioners are to file their Reply Brief. The original
4 due date for the Reply Brief was August 8, 2016. Due to an error in the
5 calculation of the due date of the Reply Brief, Appellant and Petitioners believed
6 the Reply Brief was due on August 9, 2016. On August 9, 2016, counsel for
7 Appellant and Petitioners contacted the clerk of this Court to obtain a telephonic
8 extension of time to file the Reply Brief. At that time, counsel was advised by the
9 clerk that the due date had been August 8, 2016 not August 9, 2016 and that a
10 telephonic extension could not be granted.
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14 By way of this motion, Appellant and Petitioners now seek an extension of
15 an additional 10 days, up to and including August 18, 2016, to file its Reply Brief.
16 This would be the first extension obtained on the filing of the Reply Brief.
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1 Counsel for Appellant and Petitioners requires this extension because lead
2 counsel Mr. Chris Wicker was out of the office from July 23, 2016 to July 30,
3 2016 participating in the Democratic National Convention and was therefore
4 unable to work on the Reply Brief. Counsel for Respondents have been notified
5 of the proposed extension and have no objection to the request. Accordingly,
6 Appellant and Petitioners request that they be granted an extension, permitting the
7 filing of their Reply Brief by August 18, 2016.
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10 Dated this 9th day of August, 2016.

11
12 WOODBURN AND WEDGE

13 By: /s/ Joshua Woodbury

14 W. Chris Wicker, Esq.

15 Nevada Bar No. 1037

16 John F. Murtha, Esq.

17 Nevada Bar No. 835

18 Joshua Woodbury, Esq.

19 Nevada Bar No. 11326

20 Attorneys for Appellant and Petitioners

21 Public Retirement System of Nevada

22 Chris Nielsen, Esq.

23 Nevada Bar No. 8206

24 Attorney for Appellant
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Woodburn and Wedge and that on this date, I caused to be sent via electronic mail a true and correct copy of the MOTION FOR EXTENSION OF TIME TO FILE REPLY

BRIEF to:

Dennis L. Kennedy
Kelly B. Stout
Bailey Kennedy
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Las Vegas, NV 89148

Chris Nielsen
Public Employees Retirement System
693 W. Nye Lane
Carson City, Nevada 89703

DATED this 9th day of August, 2016.

By: /s/ JoAnn Baumer
JoAnn Baumer