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5 *Attorney for Dontae Hudson*

Electronically Filed  
Jul 05 2016 10:34 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

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

7 DR. SHERA D. BRADLEY,  
Petitioner,

8 vs.

No. 70522

9 THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA, IN AND FOR THE  
10 COUNTY OF CLARK; AND THE  
HONORABLE DOUGLAS W.  
11 HERNDON, DISTRICT JUDGE,  
Respondents,

12 and

13 DONTAE HUDSON, AN  
INDIVIDUAL; AND THE STATE  
OF NEVADA, BY AND THROUGH  
14 STEVEN B. WOLFSON, IN HIS  
OFFICIAL CAPACITY AS  
15 DISTRICT ATTORNEY FOR THE  
COUNTY OF CLARK,  
16 Real Parties in Interest.

17 **MOTION FOR EXTENSION OF TIME TO FILE ANSWER**


18  
19 COMES NOW, KAREN A. CONNOLLY, of the law firm of KAREN A.  
20 CONNOLLY, LTD., attorney of record for Real Party in Interest, DONTAE

Motion for Extension of Time to File Answer.wpd

1 HUDSON, and hereby respectfully submits this Request for Extension of Time to  
2 File the Answering Brief pursuant to NRAP 26(b).

3 DATED this 5 day of July 2016.

4 **KAREN A. CONNOLLY, LTD.**

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6 KAREN A. CONNOLLY  
7 Nevada Bar No. 4240  
8 6600 W. Charleston Blvd., Ste. 124  
9 Las Vegas, NV 89146  
Telephone: (702) 678-6700  
Attorney for Appellant

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1 Exclusive Possession of the Marital Residence, Spousal Support, and Attorney Fees  
2 in a domestic case, Gaerlan v. Gaerlan D-16-534277-D, which has been set on an  
3 order shortening time for a hearing on July 8, 2016. An opposition to the motion  
4 must be prepared.

5       Undersigned is a sole practitioner with a busy practice. The issues raised by  
6 Bradley are complex and involve an interplay between a psychologist/patient  
7 privilege and a defendant's constitutional rights. There is no case on point in  
8 Nevada. Additional time is needed to enable counsel to further research and respond  
9 to Bradley's writ. The answer to the aforementioned writ is due July 5, 2016.

10 Undersigned is requesting additional 7 days to file the answer to the writ.

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1 Rule 26(b) of the Nevada Rules of Appellant Procedure state in pertinent part:

2 "The Court for good cause showing may upon Motion enlarge the  
3 time prescribed by these rules or by as order for doing any act, or  
4 may permit an act to be done after expiration of such time, that the  
Court may not enlarge the time for filing a Notice of Appeal

5 Accordingly, a 7-day extension of time to file the answer is requested.

6 DATED this 5 day of July 2016.

7 **KAREN A. CONNOLLY, LTD.**

8   
9 KAREN A. CONNOLLY

10 Nevada Bar No. 4240

11 6600 W. Charleston Blvd., Ste. 124

12 Las Vegas, NV 89146

13 Telephone: (702) 678-6700

14 Attorney for Appellant

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1                                    **AFFIDAVIT OF KAREN A. CONNOLLY**

2    STATE OF NEVADA                                    )  
3    COUNTY OF CLARK                                   )                    ss:

4            I, KAREN A. CONNOLLY, being first duly sworn hereby depose and affirm:

5            1.        That Karen A. Connolly, Ltd. represents James Pete.

6            2.        That Defendant Dontae Hudson has been charged by way of  
7 Information with **First Degree Kidnapping (Category A Felony - NRS 200.310,**  
8 **200.320 - NOC 50053); Sex Trafficking of a Child Under 16 Years of Age**  
9 **(Category A Felony - NRS 201.300.2a1 - NOC 58003); Child Abuse, Neglect or**  
10 **Endangerment (Category B Felony - NRS 200.508(1) - NOC 55226) and Living**  
11 **from the Earnings of a Prostitute (Category D Felony - NRS 201.320 - NOC**  
12 **51006).**

13            On June 9, 2016, Dr. Shera Bradley filed a Petition for Writ of Prohibition or,  
14 Alternatively, Mandamus in Supreme Court.

15            On June 15, 2016, this Court directed the real parties in interest, which includes  
16 Dontae Hudson, who is represented by undersigned counsel, to file an answer to the  
17 Petition for Writ of Prohibition or, Alternatively, Mandamus. The writ challenges an  
18 order of the district court directing Bradley to provide treatment records of the victim  
19 in a criminal case for an in camera review. The answer is due July 5, 2016.

20            Undersigned will be on a family vacation from June 30-July 5, 2015. Also, on  
Motion for Extension of Time to File Answer.wpd

1 June 16, 2016, undersigned counsel's 83 year old mother fell and broke her hip  
2 requiring emergency hip replacement surgery which caused an interruption in  
3 business for several days.

4       Additionally, on June 29, 2016, undersigned was served with a Motion for  
5 Exclusive Possession of the Marital Residence, Spousal Support, and Attorney Fees  
6 in a domestic case, Gaerlan v. Gaerlan D-16-534277-D, which has been set on an  
7 order shortening time for a hearing on July 8, 2016. An opposition to the motion  
8 must be prepared.

9       Undersigned is a sole practitioner with a busy practice. The issues raised by  
10 Bradley are complex and involve an interplay between a psychologist/patient  
11 privilege and a defendant's constitutional rights. There is no case on point in Nevada.  
12 Additional time is needed to enable counsel to further research and respond to  
13 Bradley's writ. The answer to the aforementioned writ is due July 5, 2016.

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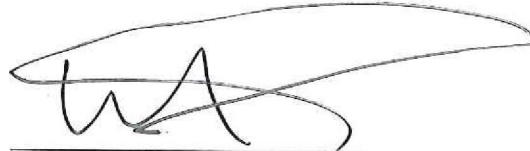
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1 Accordingly, a seven day extension of time, up to and including July 12, 2016,  
2 is requested to file the answer.

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4 KAREN A. CONNOLLY, ESQ.  
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6 SUBSCRIBED and SWORN to before me  
7 this 5 day of July, 2016.

8 

9 NOTARY PUBLIC in and for said  
County and State

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1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of KAREN A.  
3 CONNOLLY, LTD., and on the 5 day of July 2016, I served a true and correct  
4 copy of the above and foregoing *Motion for Extension of Time to File Answer*  
5 pursuant to NRCP 5 by the method or methods indicated below:

6 ☒ by depositing the same in the U.S. Mail, First Class Mail, with postage fully  
7 prepaid, at Las Vegas, Nevada, addressed as follows:

8 Steven B. Wolfson  
9 Clark County District Attorney  
200 Lewis Avenue  
10 Las Vegas, NV 89101

The Honorable Douglas W. Herndon  
Eighth Judicial District Court, Dept. 3  
200 Lewis Ave.  
Las Vegas, NV 89155

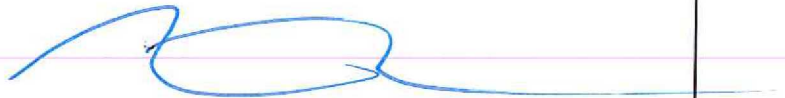
11 Kathleen Bliss, Esq.  
12 Jason Hicks, Esq.  
KATHLEEN BLISS LAW PLLC  
400 S. 4th St., Suite 500  
13 Las Vegas, Nevada 89101

14 ☒ by electronic service via eFlex:

15 Steven B. Wolfson  
16 Clark County District Attorney

The Honorable Douglas W. Herndon  
Eighth Judicial District Court, Dept. 3

17 Kathleen Bliss, Esq.  
18 Jason Hicks, Esq.  
KATHLEEN BLISS LAW PLLC

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20 Employee of KAREN A. CONNOLLY, LTD.