

IN THE SUPREME COURT OF THE STATE OF NEVADA

BOMBARDIER
TRANSPORATATION
(HOLDINGS) INC.,

Appellant,

vs.

NEVADA LABOR
COMMISSIONER; THE
INTERNATIONAL UNION OF
ELEVATOR CONSTRUCTORS; and
CLARK COUNTY,

Respondents.

Supreme Court No.: 71101

Electronically Filed
Feb 10 2017 09:51 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE OPENING BRIEF AND APPENDIX**

Appellant Bombardier Transportation (Holdings), Inc., by and through its counsel, Jackson Lewis P.C., hereby moves this Court for an order extending the time in which to submit its Opening Brief and Appendix by thirty (30) days. This Motion is made and based upon Rule 26(b) of the Nevada Rules of Appellate Procedure, the following memorandum of points and authorities and exhibits thereto, the pleadings and papers on file herein, and any oral argument the Court may allow.

I. RELIEF SOUGHT

Appellant hereby seeks an Order extending the time in which to submit its Opening Brief and Appendix by thirty (30) days.

II. DISCUSSION

This appeal arises from an underlying case, in the District Court of Clark County, in the matter *Bombardier Transportation (Holdings) Inc. v. Nevada Labor*

Commissioner; The International Union of Elevator Constructors; and Clark County, in the Supreme Court of the State of Nevada, Case No. 71101.

Pursuant to this Court's November 14, 2016 Order Reinstating Briefing, Appellant's Opening Brief and Appendix are currently due February 13, 2017. This is a complex appeal involving several matters of first impression under Nevada's prevailing wage laws. The hearing in this case spanned six days, and it has been more than two years since the hearing took place, therefore reviewing the hearing transcript for appeal has taken a substantial amount of time. In addition, the undersigned is scheduled to represent another client in a representation hearing before the National Labor Relations Board on February 14, 2017, and has spent the last several days preparing for the same.

Appellants therefore request a thirty (30) day extension of time in which to file its Opening Brief and Appendix. Counsel for all parties involved do not oppose the request. The request is made in good faith and not for purposes of delay.

Dated this 9th day of February, 2017.

JACKSON LEWIS P.C.

/s/ Paul T. Trimmer
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Attorneys for Appellants/Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 9th day of February, 2017, I caused to be served via the Nevada Supreme Court's electronic filing and service system, a true and correct copy of the above foregoing **APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND APPENDIX** to the following:

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/s/ Emily Santiago
Employee of Jackson Lewis P.C.