

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

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Mar 10 2017 10:21 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT'S SECOND 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 from March 15, 2017, up to and including April 14, 2017.

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.

On February 10, 2017, this Court granted Appellant's first Unopposed Motion for Extension of Time, extending the deadline up to and including March 15, 2017. The undersigned respectfully requests additional time due to personal commitments that have arisen, including, but not limited to the undersigned's need to attend to his father's terminal illness which lead to his recent passing.

Appellants therefore requests a thirty (30) day extension of time from March 15, 2017 up to and including April 14, 2017, 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 10th day of March, 2017.

JACKSON LEWIS P.C.

/s/ Paul T. Trimmer
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PAUL T. TRIMMER, Bar # 9291
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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 10th day of March, 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.