

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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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 from September 15, 2017, up to and including October 13, 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.

Pursuant to this Court's August 1, 2017 Order Granting Motion for extension, Appellant's Opening Brief and Appendix are currently due September 15, 2017. Associate counsel who had been working on this case resigned and left the undersigned firm on September 1, 2017. Additionally, due to undersigned counsel's scheduling conflict, more specifically, undersigned counsel is scheduled to represent another client in an arbitration hearing that is currently scheduled for September 13 and 14, 2017, and has spent the last several days preparing for the same. The undersigned also has arbitrations scheduled on September 26, 2017 and October 3, 2017.

Appellant therefore requests an extension of time in which to complete and 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 11th day of September, 2017.

JACKSON LEWIS P.C.

/s/ Paul T. Trimmer
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 11th day of September, 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
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