

In the Supreme Court of Nevada

Electronically Filed
Nov 01 2016 09:02 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

JAMES J. COTTER, JR., individually and
derivatively on behalf of READING IN-
TERNATIONAL, INC.,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT
of the State of Nevada, in and for the
County of Clark, and THE HONORABLE
ELIZABETH GONZALEZ, District Judge,
Respondent,

and

MARGARET COTTER, ELLEN COTTER,
GUY ADAMS, EDWARD KANE, DOUGLAS
MCEACHERN, WILLIAM GOULD, JUDY
CODDING, MICHAEL WROTONIAK, and
READING INTERNATIONAL, INC.,

Real Parties in Interest.

District Court No.
A-15-719860-B,
coordinated with
No. P-14-082942-E and
No. A-16-735305-B

MOTION FOR EXTENSION TO FILE REPLY BRIEF

Petitioner requests 30 days, through December 1, 2016, to file his
reply brief. NRAP 31(b)(3). The brief was originally due November 1.

This is the first request for an extension.

Counsel need additional time because developments in the under-
lying district-court case have made it impracticable to respond to the

answer of real parties in interest. Although this Court stayed the order being challenged in this writ petition, other aspects of discovery and trial preparation are going forward and have required the attention of counsel. Just from the last several weeks this includes eight motions for summary judgment, two motions *in limine*, and a motion to reconsider an earlier ruling on waiver of privilege. Other fact and expert discovery remains to be completed.

The requested extension will enable petitioner to give the answer—nearly three times the length of the petition—a careful and thorough response.

Dated this 31st day of October, 2016.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Mark G. Krum
MARK G. KRUM (SBN 10,913)
3993 Howard Hughes Parkway,
Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Petitioner

CERTIFICATE OF SERVICE

I certify that on October 31, 2016, I served a copy of the foregoing
“MOTION FOR EXTENSION TO FILE REPLY BRIEF” by mailing a true and
correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed
as follows:

H. Stan Johnson
Michael V. Hughes
COHEN, JOHNSON PARKER EDWARDS
255 East Warm Springs Road
Suite 100
Las Vegas, NV 89119

Christopher Tayback
Marshall M. Searcy
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 South Figueroa St., 10th Fl.
Los Angeles, CA 90017

*Attorneys for Margaret Cotter, Ellen Cotter, Guy Adams, Edward Kane,
Douglas McEachern, Judy Coddington, and Michael Wrotniak*

Donald A. Lattin
Carolyn K. Renner
MAUPIN, COX & LEGOY
4785 Caughlin Parkway
Reno, NV 89519

Mark E. Ferrario
Kara B. Hendricks
GREENBERG TRAURIG, LLP
3773 Howard Hughes Pkwy., Suite 400 N
Las Vegas, NV 89169

Attorneys for William Gould Attorneys for Reading International, Inc.

Honorable Elizabeth Gonzalez
Department 11
Eighth Judicial District Court
200 Lewis Avenue
Las Vegas, NV 89155

/s/ Dana Provost
An Employee of Lewis Roca Rothgerber Christie LLP