

IN THE SUPREME COURT OF THE STATE OF NEVADA

<p>ARCHON CORPORATION, PAUL W. LOWDEN, and SUZANNE LOWDEN, Petitioners,</p> <p>vs.</p> <p>THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK; AND THE HONORABLE JOE HARDY, DISTRICT COURT JUDGE Respondents,</p> <p><i>and</i></p> <p>STEPHEN HABERKORN, an individual, Real Party in Interest.</p>	<p>Supreme Court No. 71802</p> <p>State Court Case No. A-16-75261-B</p> <p>Electronically Filed Mar 13 2017 02:57 p.m. Elizabeth A. Brown Clerk of Supreme Court</p>
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**MOTION TO EXCEED THE PAGE LIMITATION FOR PETITIONERS’
MOTION TO STAY PROCEEDINGS IN THE DISTRICT COURT**

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Comes now Petitioners by and through their attorneys of record, Dickinson Wright PLLC, and moves this Court for leave to file an enlarged Motion to Stay. The Motion exceeds the page limitation of NRAP 27(d)(2) by approximately nine substantive pages.

The Motion is required to be longer than ten pages because the legal standard for a motion to stay requires Petitioners to demonstrate that they are likely to prevail on the merits of their writ petition. In this case, such an argument requires a substantive discussion of the arguments presented by the writ petition, which addresses a complex legal issue which has never been addressed by this Court, namely whether Nevada should adopt the doctrine of cross-jurisdictional, class-action tolling. Such briefing entails discussion of caselaw and commentary from many jurisdictions across the United States, and thus it is necessarily somewhat lengthy. In addition to this substantive discussion, Petitioners are also required to discuss (1) whether the object of the writ petition will be defeated if the stay is denied; (2) whether the petitioner will suffer irreparable or serious injury if the stay is denied; and (3) whether the real party in interest will suffer irreparable injury if the stay is granted. NRAP 8(c). As such, Petitioners have attempted to present a succinct argument in their Motion to Stay; nevertheless a certain amount of briefing is necessary in order for Petitioners to address each requirement of NRAP 8(c).

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Therefore, Petitioners respectfully request that this Court grant it leave to file its enlarged Motion.

DATED this 13th day of March, 2017.

DICKINSON WRIGHT, PLLC

/s/ Kenneth K. Ching

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25(c), the undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 13th day of March, 2017, she served a copy of the foregoing **MOTION TO EXCEED THE PAGE LIMITATION FOR PETITIONERS' MOTION TO STAY PROCEEDINGS IN THE DISTRICT COURT** by placing said copy in an envelope, postage fully prepaid, in the U.S. Mail at Reno, Nevada, said envelope addressed to:

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Honorable Joe Hardy
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/s/ Whitney M. Jones
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