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IN THE SUPREME COURT OF THE STATE OF NEVADA

VETERANS IN POLITICS
INTERNATIONAL, INC. and
STEVE W. SANSON,

Appellants,

vs.

MARSHAL S. WILLICK and
WILLICK LAW GROUP,

Respondents.

Supreme Court No. 72778

District Court No. A-17-750171-C

**STIPULATION TO EXTEND
DEADLINE FOR ANSWERING
AND REPLY BRIEFS**

(SECOND REQUEST)

**Response Requested by October
19, 2017**

Appellants Veterans In Politics International, Inc. and Steve W. Sanson
(together, the “VIPI Parties”), and Respondents Marshal S. Willick and Willick

Electronically Filed
Oct 19 2017 01:30 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

1 Law Group (together, the “Willick Parties”), by and through their respective
2 counsel, stipulate and agree, pursuant to NRAP 26(b)(2), to extend the briefing
3 schedule deadline for the Answering Brief and the Reply Brief as follows:

4 1. On April 3, 2017, the VIPI Parties filed and served their Notice
5 of Appeal, which was docketed with this Court on April 10, 2017;

6 2. On May 9, 2017, this Court entered its Order Removing from
7 Settlement Program and Reinstating Briefing, providing that the VIPI Parties
8 shall have 90 days to file and serve their Opening Brief and Appendix;

9 3. On May 15, 2017, the VIPI Parties filed and served their
10 Docketing Statement – Civil Appeals;

11 4. On August 2, 2017, this Court entered its Order Granting
12 Telephonic Extension, providing that the VIPI Parties shall have until August
13 21, 2017 to file and serve their Opening Brief and Appendix;

14 5. On August 21, 2017, the VIPI Parties filed and served their
15 Opening Brief and Appendix;

16 6. On September 18, 2017, the parties stipulated to extend the
17 deadline for the Willick Parties to file and serve their Answering Brief, from
18 September 20, 2017 to October 20, 2017;

1 7. On September 19, 2017, the Court issued a Notice approving the
2 parties' September 18, 2017 Stipulation;

3 8. On September 29, 2017, the Willick Parties filed a Motion to
4 Consolidate Appeals (the "Motion to Consolidate"), seeking to consolidate
5 this appeal with the following appeals that are currently pending before this
6 Court: *Brandon Saiter v. Tina Saiter*, Case No. 72819 (the "Saiter Appeal");
7 and *Jennifer V. Abrams, et al. v. Steve W. Sanson, et al.*, Case No. 73838 (the
8 "Abrams Appeal");

9 9. On October 10, 2017, the parties signed a stipulation, and it was
10 filed with this Court that same day (after the conclusion of this Court's
11 computer system maintenance), although it was not accepted until October 11,
12 2017, extending the deadline for the VIPI Parties to file their response to the
13 Motion to Consolidate, from October 10, 2017 to October 17, 2017;

14 10. On October 12, 2017, the Willick Parties filed a Motion to
15 Extend Deadline for Answering Brief (the "Motion to Extend"), seeking to
16 extend the October 20, 2017 deadline for their Answering Brief until this
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1 Court (i) rules on the Motion to Consolidate and (ii) decides whether to retain
2 jurisdiction of the Saiter Appeal;¹

3 11. Briefing in the Abrams Appeal is currently stayed while the
4 parties participate in this Court's settlement program. On October 6, 2017,
5 Settlement Judge Robert F. Saint-Aubin filed the Early Case Assessment
6 Report indicating that the appeal is appropriate for the settlement program and
7 that dates are being considered by the parties for a mediation session. The
8 parties currently anticipate attending mediation in or around December 2017.

9 Any settlement that may be reached in the Abrams Appeal will likely impact
10 this appeal (and the Saiter Appeal, if it is not dismissed), as the parties intend
11 to discuss the possibility of a global settlement. As a result, the deadlines for
12 filing the Answering Brief and the Reply Brief should be stayed, and the
13 Motion to Extend should be taken off calendar, pending the outcome of the
14 mediation session;

15 12. Within twenty (20) days (given the holidays in December and the
16 unavailability of counsel for the VIPI Parties for nearly two weeks in
17 December) of the mediation session, the parties will prepare and submit to this

18 ¹ On October 11, 2017, Appellant in the Saiter Appeal filed his Response
to this Court's October 3, 2017 Order to Show Cause.

1 Court a joint status report indicating whether a settlement was reached; and if
2 not, proposing new deadlines for the Answering Brief and the Reply Brief
3 (subject to the Willick Parties' right to re-file their Motion to Extend);

4 13. Good cause exists for this extension; specifically: It is in the
5 interests of judicial economy, and it will avoid causing the parties to
6 potentially incur unnecessary attorney's fees and costs, to continue further
7 briefing in this appeal until after the parties discuss the possibility of a global
8 settlement at the mediation session in the Abrams Appeal; and

9 14. This stipulation is entered into in good faith by all the parties and
10 is not intended to unduly delay these proceedings.

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1 The parties request an Order from this Court approving the above
2 Stipulation.

3 DATED this 19th day of October,
4 2017.

5 BAILEY ♦ KENNEDY

DATED this 19th day of October,
2017.

ANAT LEVY & ASSOCIATES, P.C.

6 By: /s/ Joshua P. Gilmore
7 DENNIS L. KENNEDY
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 19th day of October, 2017, service of the foregoing **STIPULATION TO EXTEND DEADLINE FOR ANSWERING BRIEF (SECOND REQUEST)**, was made by electronic service through the Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known addresses:

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/s/ Susan Russo
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