

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

LAS VEGAS REVIEW-JOURNAL,

Appellant,

vs.

CITY OF HENDERSON,

Respondent.

Electronically Filed  
May 24 2018 09:14 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Case No. 73287

DC Case No. A-16-747289-W

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S  
REPLY BRIEF [FIRST REQUEST]**

Appellant Las Vegas Review-Journal, hereby respectfully requests sixty (60) days, until July 23, 2018, to file its Reply Brief, which is currently due on May 24, 2018. This is Appellant's first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein. Brian Reeve, counsel for Respondent, has indicated Respondent has no objection to this request.

DATED this 23rd day of May, 2018.

/s/ Alina M. Shell

Margaret A. McLetchie, Nevada Bar No. 10931

Alina M. Shell, Nevada Bar No. 11711

MCLETCHIE SHELL LLC

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

Telephone: (702) 728-5300; Fax: (702) 425-8220

Email: maggie@nvlitigation.com

*Counsel for Appellant*

## MEMORANDUM

I, Alina M. Shell, am an attorney of record in the above-captioned case.

This Court may “[f]or good cause” extend the time “prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires.” NRAP 26(b)(1)(A). Here, there is “good cause” because the undersigned counsel had an unexpected emergency filing obligation in another matter. Specifically, on May 17, 2018, counsel had to file a motion for an order to show cause on an order shortening time in *American Broadcasting Companies Inc., et al. v. Las Vegas Metropolitan Police Department*, Eighth Judicial District Court Case No. A-17-764030-W. Preparing that motion required extraordinary time and resources, and prevented counsel from working on other matters, including the reply currently due in this case.

Appellant’s Reply Brief is currently due May 24, 2018. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of sixty (60) days for the Reply Brief, which would move that deadline from May 24, 2018 to July 23, 2018.

On May 21, 2018, Review-Journal counsel Margaret A. McLetchie contacted Brian Reeve, counsel for Respondent regarding the emergency need for this extension. Mr. Reeve indicated Respondent has no objection to this request. The undersigned appreciates opposing counsel’s professional courtesy.

The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 23rd day of May, 2018.

*/s/ Alina M. Shell*

---

Margaret A. McLetchie, Nevada Bar No. 10931

Alina M. Shell, Nevada Bar No. 11711

MCLECHIE SHELL LLC

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

Telephone: (702) 728-5300; Fax: (702) 425-8220

Email: [maggie@nvlitigation.com](mailto:maggie@nvlitigation.com)

*Counsel for Appellant*

## **CERTIFICATE OF SERVICE**

I certify that I am an employee of McLetchie Shell LLC and that on this 23rd day of May, 2018 the UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT’S REPLY BRIEF [FIRST REQUEST] was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the Master Service List as follows:

Josh M. Reid, Brandon P. Kemble, and Brian R. Reeve  
**CITY OF HENDERSON’S ATTORNEY OFFICE**  
240 Water Street, MSC 144  
Henderson, NV 89015

Dennis L. Kennedy, Sarah P. Harmon, and Kelly B. Stout  
**BAILEY KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, NV 89148

*Counsel for Respondent City of Henderson*

/s/ Pharan Burchfield  
Employee, McLetchie Shell LLC