

IN THE SUPREME COURT OF THE STATE OF NEVADA

JENNIFER ABRAMS; AND THE
ABRAMS & MAYO LAW FIRM,

Appellants,

vs.

STEVE W. SANSON; VETERANS
IN POLITICS INTERNATIONAL,
INC., LOUIS C. SCHNEIDER; AND
LAW OFFICES OF LOUIS C.
SCHNIEDER, LLC,

Respondents.

Electronically Filed
Jan 03 2019 04:18 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case Nos. 73838/75834

DC Case No. A-17-749318-C

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLEES’
ANSWERING BRIEF [FIRST REQUEST]**

Appellees Steve W. Sanson and Veterans In Politics International, Inc. (“VIPI Defendants”), hereby respectfully request forty-six (46) days, until February 22, 2019, to file their Answering Brief, which is currently due on January 7, 2019.¹ This is Appellees’ first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein.

///

///

///

///

¹ Appellee Louis C. Schneider has sought an extension of time until February 22, 2019.

Counsel for Appellants, Joshua P. Gilmore, has indicated that Appellants have no objection to this request.

DATED this 3rd day of January, 2019.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

MCLETCHE LAW

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

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

Email: maggie@nvlitigation.com

*Counsel for Appellees Steve W. Sanson and
Veterans In Politics International, Inc.*

MEMORANDUM

I, Margaret A. McLetchie, 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 counsel for Appellees has deadlines in other matters which interfere with the completion of the Answering Brief. Specifically, the undersigned has oral argument on an Emergency Petition for Writ of Prohibition filed in *Las Vegas Metropolitan Police Department v. Eighth Judicial District Court*, Case No. 76848. The undersigned is counsel for real party in interest the Las Vegas Review-Journal in that matter. Because the Emergency Petition for Writ of Prohibition involves complex legal issues, undersigned counsel will need a substantial amount of time to prepare for argument in that matter.

Good cause also exists because Appellants—who filed their Opening Brief and Appendices on December 6, 2018—have not provided the sealed portions of Volume IV of their Appendices to Appellees. Thus, the undersigned requires additional time to obtain and review the materials contained in the sealed portion of Volume IV and incorporate any facts and arguments from those materials in their Answering Brief.

Additionally, on January 3, 2019, Joseph W. Houston, counsel for Appellees Louis C. Schneider and Law Offices of Louis C. Schneider, LLC, filed a motion with this Court requesting a similar extension to February 22, 2019 for filing their Answering Brief. *See* Doc. No. 19-00311.² Permitting the separate Appellees to have identical deadlines for submitting their respective Answering Briefs will streamline litigation for all parties in this matter and avoid multiple Reply Brief deadlines for Appellants.

The VIPI Defendants' Answering Brief is currently due January 7, 2019. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. The VIPI Defendants therefore respectfully request an extension of forty-six (46) days for their Answering Brief, which would move that deadline from January 7, 2019 to February 22, 2019.

On January 3, 2019, Alina M. Shell, an attorney in the undersigned's office, contacted Joshua P. Gilmore, counsel for the Abrams Parties, regarding the need for this extension. Mr. Gilmore indicated the Abrams Parties have no objection to this extension, and do not intend to oppose it. The undersigned appreciates opposing

² In their motion for an extension of time for filing an Answering Brief, the Schneider Defendants indicated that their Answering Brief is due on January 8, 2019 and asked for an extension of 45 days—until February 22, 2019—to file the Brief. Doc. No. 19-00311, pp. 2-3. The Court's docket for this case, however, indicates that Answering Brief are due January 7, 2019. In any event, to streamline litigation in this matter, the VIPI Defendants request an identical extension to February 22, 2019.

counsel's professional courtesy.

Additionally, on January 3, 2019, Ms. Shell spoke to Mr. Houston, counsel for the Schneider Defendants, to inform him that the VIPI Defendants would be filing the instant motion.

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

DATED this 3rd day of January, 2019.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

MCLEATCHIE LAW

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

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

Email: maggie@nvlitigation.com

*Counsel for Appellees Steve W. Sanson and
Veterans In Politics International, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLEES' ANSWERING BRIEF [FIRST REQUEST] was filed electronically with the Nevada Supreme Court on the 3rd day of January, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Dennis L. Kennedy and Joshua P. Gilmore
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Jennifer V. Abrams
THE ABRAMS & MAYO LAW FIRM
6252 S. Rainbow Blvd., Suite 100
Las Vegas, NV 89118

Marshal S. Willick
WILLICK LAW GROUP
3591 E. Bonanza Rd., Ste. 200
Las Vegas, NV 89110-2101
Attorneys for Appellants

/s/ Pharan Burchfield
Employee of McLetchie Law