

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE ORIGINAL ROOFING
COMPANY, LLC,

Appellant,

vs.

CHIEF ADMINISTRATIVE OFFICER
OF THE OCCUPATIONAL SAFETY
AND HEALTH ADMINISTRATION,
DIVISION OF INDUSTRIAL
RELATIONS OF THE DEPARTMENT
OF BUSINESS AND INDUSTRY,
STATE OF NEVADA,

Respondent.

Case No.: 74048

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Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial District
Court, the Honorable Jim Crockett
Presiding

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
(First Request)

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Appellant, Original Roofing Company, LLC (“Appellant”), by and through its counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 30-day extension of time to file their reply brief.

Appellant’s reply brief is currently due on February 20, 2018. This is Appellant’s first request for an extension of time to file their reply brief. If this Court grants this request for a 30-day extension, Appellant’s reply brief will be due on March 22, 2018. Good cause exists for allowing Appellant to extend the filing deadline until March 22, 2018:

Ms. Karoum has oral argument before this Court on February 15, 2018 in Case No. 72098, *Rodriguez v. Fiesta Palms, LLC et al.* and is dedicating a significant amount of time for the preparation.

Additionally, Ms. Karoum and Mr. Echols have two reply briefs and an answering brief on cross-appeal due in the Ninth Circuit in appeal Case Nos. 16-16723/17-16060, *Mathis, et al. v. County of Lyon, et al.* and an answering brief in cross-appeal Nos. 16-16938/17-16194, *Mathis et al. v. County of Lyon, et al.*, on March 1, 2018. The *Mathis* appeal involves ten years of litigation, with appeals and cross-appeals filed by multiple parties, and the briefing is extensive.

An additional 30 days will allow Appellant’s reply brief to be completed and circulated to the client for review and for counsel to make any needed revisions

prior to filing with the Court. Appellant plans to file its reply brief on or before the requested due date of March 22, 2018.

Therefore, Appellant respectfully requests that the deadline to file their reply brief be extended by 30 days to March 22, 2018. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 1st day of February, 2018.

MARQUIS AURBACH COFFING

By /s/ Adele V. Karoum
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was filed electronically with the Nevada Supreme Court on the 1st day of February, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Donald C. Smith

/s/ Leah Dell

Leah Dell, an employee of
Marquis Aurbach Coffing