

IN THE SUPREME COURT OF THE STATE OF NEVADA

BRYAN MICHAEL FERGASON,

Appellant,

vs.

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT,

Respondent.

Case No.: 74411

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May 08 2018 02:55 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial District
Court, The Honorable Douglas E. Smith
Presiding

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

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NRAP 26.1 DISCLOSURE

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a), and must be disclosed. These representations are made in order that the Justices of this Court may evaluate possible disqualification or recusal.

1. Respondent, Las Vegas Metropolitan Police Department (“LVMPD”), is a governmental entity and has no corporate affiliation.

2. LVMPD was previously represented in the District Court and in this Court, in prior related cases, by the Clark County District Attorney’s office.

3. LVMPD is represented in the District Court and this Court by LVMPD’s Office of General Counsel and Marquis Aurbach Coffing.

Dated this 8th day of May, 2018.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols
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MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF
(First Request)

Respondent, Las Vegas Metropolitan Police Department (“LVMPD”), by and through their counsel of record, Marquis Aurbach Coffing, hereby moves this Court pursuant to NRAP 31(b) for a 30-day extension of time to file its answering brief.

On April 12, 2018, this Court ordered LVMPD to file an answering brief, making LVMPD’s answering brief currently due on May 14, 2018. No previous extensions have been requested. If this Court grants this request for a 30-day extension, LVMPD’s answering brief will be due on June 13, 2018. Good cause exists for allowing LVMPD to extend the filing deadline until June 1, 2018:

One of LVMPD’s counsel, Adele V. Karoum, Esq., has left the firm and is relocating out of state, and, as such, this case has been reassigned within the firm to newly-appearing counsel, Kathleen A. Wilde, Esq. This change in counsel will cause an unexpected delay in the drafting of the answering brief. The additional 30 days will allow new counsel to review the underlying case, the Appellant’s questionnaire and record on appeal, and draft the answering brief in the instant appeal.

In addition, lead appellate counsel, Micah S. Echols, Esq. has been unable to step in to draft LVMPD’s answering brief due to being involved in two trials over

the past two weeks in District Court Case No. A-14-708310-C (*Bruce Greenberg v. Forum Shops LLC*) and District Court Case No. A-16-734596-C (*Steve Ayres v. Ron Peck*).

Therefore, LVMPD respectfully requests that the deadline to file its answering brief be extended by 30 days to June 13, 2018. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 8th day of May, 2018.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** was filed electronically with the Nevada Supreme Court on the 8th day of May, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

N/A

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

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P.O. Box 650
Indian Springs, NV 89070-0650
Appellant in Proper Person

/s/ Leah Dell

Leah Dell, an employee of
Marquis Aurbach Coffing