

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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Jun 14 2018 08:38 a.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
(Second Request)

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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 28-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 originally due on May 14, 2018. This Court granted one 30-day extension based upon a change of counsel within the firm, making LVMPD’s answering brief currently due on June 13, 2018. If this Court grants this request for a 28-day extension, LVMPD’s answering brief will be due on July 11, 2018. Good cause exists for allowing LVMPD to extend the filing deadline until July 11, 2018:

Recently-appearing counsel, Kathleen A. Wilde, Esq., has been heavily involved in unexpected post-trial briefing in District Court Case No. A-15-723607-C (*Pizanowski v. Stepanyan*) in addition to her normal workload, which has caused an unexpected delay in the preparation of the answering brief in the instant case.

In addition, over the last 30 days, Micah S. Echols, Esq. has prepared the answering brief in Supreme Court Case No. 74730 (*JSD Properties, LLC v. Grant, Morris, Dodds, PLLC*), prepared an amicus brief on behalf of the Litigation Section of the State Bar of Nevada on a very short timeline in Case No. 75707

(*GoldenTree Master Fund, Ltd. v. Eighth Judicial District Court*), prepared the opening brief in Supreme Court Case No. 74604 (*Clark County Office of the Coroner v. Las Vegas Review-Journal*), and was involved in preparation for oral argument in Supreme Court Case No. 74001 (*Las Vegas Metropolitan Police Department v. Eight Judicial District Court*). Mr. Echols has also been involved in the unexpected post-trial briefing in *Pizanowski*. Mr. Echols was also out of the office for 9 days on a family matter out of state during the months of May and June. These matters have caused a delay in the preparation of the answering brief in the instant case.

Therefore, LVMPD respectfully requests that the deadline to file its answering brief be extended by 28 days to July 11, 2018. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 13th day of June, 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 13th day of June, 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:

Bryan Fergason (BAC #96803)
High Desert State Prison
P.O. Box 650
Indian Springs, NV 89070-0650
Appellant in Proper Person

/s/ Leah Dell

Leah Dell, an employee of
Marquis Aurbach Coffing