

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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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
(Third Request)

Marquis Aurbach Coffing

Micah S. Echols, Esq.
Nevada Bar No. 8437
Kathleen A. Wilde, Esq.
Nevada Bar No. 12522
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
mechols@maclaw.com
kwilde@maclaw.com

Las Vegas Metropolitan

Police Department
Liesl Freedman
General Counsel
Nevada Bar No. 5309
Matthew Christian
Assistant General Counsel
Nevada Bar No. 8024
400 S. Martin Luther King Blvd.
Las Vegas, Nevada 89106
Telephone: (702) 828-4970
Facsimile: (702) 828-4973
m16091c@lvmpd.com

Attorneys for Respondent, Las Vegas Metropolitan Police Department

MAC:05166-785 3452611_1

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 14-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 due on June 13, 2018. This Court granted an additional 28-day extension in its June 21, 2018 order. If this Court grants this request for a 14-day extension, LVMPD’s answering brief will be due on July 25, 2018. Good cause exists for allowing LVMPD to extend the filing deadline until July 25, 2018:

The father-in-law of lead appellate counsel, Micah S. Echols, had a heart attack the last week of June which required a subsequent related surgery. As a result, Mr. Echols has been out of the office a number of days over the past couple of weeks to attend to this emergency and the needs of his family. This has caused an unexpected and unavoidable delay in the completion of LVMPD’s answering brief in the instant case. The additional requested time will also allow co-counsel to comment and make revisions to the brief.

Therefore, LVMPD respectfully requests that the deadline to file its answering brief be extended by 14 days to July 25, 2018. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 11th day of July, 2018.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols

Micah S. Echols, Esq.

Nevada Bar No. 8437

Kathleen A. Wilde, Esq.

Nevada Bar No. 12522

10001 Park Run Drive

Las Vegas, Nevada 89145

Attorneys for Respondent,

Las Vegas Metropolitan Police Department

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 11th day of July, 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