Case Nos. 73856 & 74566

In the Supreme Court of Nevada

CLARK COUNTY SCHOOL DISTRICT, Appellant,

vs.

MARY BRYAN, mother of ETHAN BRYAN; and AIMEE HAIRR, mother of NOLAN HAIRR,

Respondents.

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Appellant Clark County School District requests 30 days, through January 4, 2019, to file its reply brief. NRAP 31(b)(3). This is the second such motion. (The parties previously stipulated to extend the deadline pursuant to NRAP 31(b)(2).) The brief was originally due October 5 and without the extension, would be due December 5. No requests for extension have been denied or denied in part.

Although counsel have completed a draft of the brief, extraordinary personal and medical circumstances warrant the extension. Counsel again had to take time to assist a family member whose living situation has deteriorated in the aftermath of a divorce. During this same time, a family pet began experiencing extreme pain and anxiety that

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Elizabeth A. Brown

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Clerk of Supreme Court

did not respond to treatment, so counsel's family has been weighing the serious decision of whether to euthanize her. Finally, in the last several days counsel's daughter, and then spouse, fell ill—an illness that has persisted now more than a week—requiring additional care. The draft could not be finalized by other members of counsel's firm because of their being brought into a high-stakes trial on the eve of opening statements. While counsel has continued to work on the brief during this time, the requested extension would greatly ease counsel's burden in finalizing the draft.

We appreciate the extraordinary nature of the request. But for these unforeseeable developments, the brief would have been ready to file. We ask the Court's courtesy in granting this final extension.

Dated this 5th day of December, 2018.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2018, I submitted the foregoing "Motion for Extension of Time to File Reply Brief" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be

sent to the following:

ALLEN LICHTENSTEIN ALLEN LICHTENSTEIN ATTORNEY AT LAW, LTD. 3315 Russell Road, No. 222 Las Vegas, Nevada 89120

I further certify that a copy of this document was mailed, postage

prepaid, at Las Vegas, Nevada, to the following:

JOHN HOUSTON SCOTT SCOTT LAW FIRM 1388 Sutter Street, Suite 715 San Francisco, California 94109

> <u>/s/ Adam Crawford</u> An Employee of Lewis Roca Rothgerber Christie LLP