

IN THE SUPREME COURT OF THE STATE OF NEVADA

CLARK COUNTY OFFICE OF THE
CORONER/MEDICAL EXAMINER,

Appellant,

vs.

LAS VEGAS REVIEW-JOURNAL,

Respondent.

SUPREME COURT CASE NO.:
74604

DISTRICT COURT CASE NO.:
A-17-758501-W

Electronically Filed
Jun 29 2018 09:34 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONDENT'S
ANSWERING BRIEF [FIRST REQUEST]**

Margaret A. McLetchie, Nevada Bar No. 10931
Alina M. Shell, Nevada Bar No. 11711
MCLETCHIE SHELL LLC
701 East Bridger Ave., Suite 520
Las Vegas, Nevada 89101
Telephone: (702) 728-5300
Fax: (702) 425-8220
Email: maggie@nvlitugation.com
Counsel for Respondent, Las Vegas Review-Journal

**UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONDENT'S
ANSWERING BRIEF [FIRST REQUEST]**

Respondent LAS VEGAS REVIEW-JOURNAL, by and through its counsel, Margaret A. McLetchie and Alina M. Shell of McLetchie Shell, LLC, hereby respectfully requests thirty-eight (38) days, until August 13, 2018, to file its Answering Brief, which is currently due on July 6, 2018. This is Respondent's first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein. Micah Echols, counsel for Appellant, has indicated Appellant has no objection to this request.

DATED this the 29th day of June, 2018.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

Alina M. Shell, Nevada Bar No. 11711

MCLETCHIE SHELL LLC

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

Counsel for Respondent, Las Vegas Review-Journal

MEMORANDUM

I, Margaret A. McLetchie, am an attorney of record for the Las Vegas Review-Journal in the above-captioned case.

This Court may “[f]or good cause” extend the time “prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires.” NRAP 26(b)(1)(A). Here, there is “good cause” to extend the deadline from July 6, 2018 to August 13, 201 because the undersigned counsel has had conflicting deadlines in several other matters (some of which were unexpected), and must travel for an upcoming argument before this Court and a settlement conference in another matter.

Counsel has a reply to a motion for partial summary judgment due on July 5, 2018 in *Thomas Walker, et al. v. City of North Las Vegas, et al.*, U.S. Dist. Ct. Case No. 2:14-cv-01475-JAD-NJK. Counsel also has proposed findings of fact due on July 11, 2018 in *Howard v. Foster, et al.*, U.S. Dist. Ct. Case No. 2:13-cv-01386-RFB-NJK, a § 1983 prisoner’s rights case in which the undersigned is appointed pro bono counsel.

The undersigned will be participating in oral argument before this Court in *Clark County School District v. Las Vegas Review-Journal*, Case No. 73525 on July 18, 2018, and is preparing for that argument. The undersigned will also be out of the jurisdiction July 25, 2018 through July 26, 2018 to participate in a settlement

conference in *Trost v. Cox, et al.*, U.S. Dist. Ct. Case No. 3:14-cv-0611-MMD-WGC, a 42 U.S.C. § 1983 prisoner's rights case in which the undersigned is appointed pro bono counsel.

The undersigned counsel has also had recent deadlines in other matters which interfered with her ability to prepare the Answering Brief in this matter. Specifically, on June 6, 2018, the Las Vegas Metropolitan Police Department filed an Emergency Motion for Writ of Prohibition in *Las Vegas Metropolitan Police Department v. Eighth Judicial District Court*, Nev. S. Ct. Case No. 76023. Pursuant to an order entered by this Court, on June 18, 2018, counsel filed a Response in Opposition to the Petition. Subsequently, after the Las Vegas Metropolitan Police Department filed a Motion to Strike the Review-Journal's Response in Opposition on June 19, 2018, the undersigned filed a Response was filed with this Court on June 22, 2018. Counsel was required to stop work in other matters to file these Responses. Additionally, on June 20, 2018, counsel filed an opposition to a motion for summary judgment filed by the defendants in *Thomas Walker, et al. v. City of North Las Vegas, et al.*, U.S. Dist. Ct. Case No. 2:14-cv-01475-JAD-NJK. Counsel also had an extensive settlement conference brief due on June 27, 2018 *Trost v. Cox, et al.*, U.S. Dist. Ct. Case No. 3:14-cv-0611-MMD-WGC.

Moreover, Alina M. Shell, who is also counsel for the Review-Journal in this matter and will be assisting the undersigned with the preparation of the Answering Brief will be out of the jurisdiction August 5, 2018 through August 9, 2018.

Respondent's Answering Brief is currently due July 6, 2018. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Respondent thus respectfully requests an extension of thirty-eight (38) days for the Answering Brief, which would move that deadline from July 6, 2018 to August 13, 2018.

On June 28, 2018, counsel for Respondent Alina M. Shell contacted Micah Echols, counsel for Appellant regarding the need for this extension. Mr. Echols indicated Appellant has no objection to this request. The undersigned appreciates opposing counsel's professional courtesy.

The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this the 29th day of June, 2018.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

Alina M. Shell, Nevada Bar No. 11711

MCLETCHIE SHELL LLC

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

Counsel for Respondent, Las Vegas Review-Journal

CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONDENT'S ANSWERING BRIEF [FIRST REQUEST] was filed electronically with the Nevada Supreme Court on the 29th day of June, 2018. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Steven B. Wolfson and Laura Rehfeldt
Clark County District Attorney's Office

Micah S. Echols
Marquis Aurbach Coffing

*Counsel for Appellant,
Clark County Office of the Coroner/Medical Examiner*

/s/ Pharan Burchfield
Employee of McLetchie Shell LLC