

IN THE SUPREME COURT OF THE STATE OF NEVADA

CHRISTINA PAULOS,

Appellant,

vs.

FCH1, LLC; LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT; JEANNIE HOUSTON;
and AARON BACA,

Respondents.

Case No.: 74912

Appeal from the Eighth Judicial District
Court, The Honorable Rob Bare
Presiding.

Electronically Filed
Dec 07 2018 04:13 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

JOINT MOTION REGARDING BRIEFING DEADLINES

Appellant, Christina Paulos, by and through her counsel of record, Lewis Roca Rothgerber Christie LLP, Respondents, Las Vegas Metropolitan Police Department and Aaron Baca (the “LVMPD Respondents”) by and through their counsel of record, Marquis Aurbach Coffing, and Respondents FCH1, LLC and Jeannie Houston, by and through their counsel of record, Moran Brandon Bendavid Moran jointly move this Court pursuant to NRAP 31(b) for a 30-day extension of time for the LVMPD Respondents to file their answering brief and a corresponding 30-day extension of time for Ms. Paulos to file her reply brief.

The LVMPD Respondents’ answering brief was originally due on August November 26, 2018. This Court granted the LVMPD Respondents’ 14-day

telephonic extension request on November 21, 2018, making Wynn's answering brief due on December 10, 2018. If this Court grants the instant request for a 30-day extension, the LVMPD Respondents' answering brief will be due on or before January 10, 2019. In turn, Ms. Paulos' combined reply to FCHI1's answering brief and the LVMPD's answering brief will be due on February 11, 2019.

Good cause exists for allowing the proposed extended deadlines because:

1. Counsel for the parties conferred and agreed regarding the proposed extensions. The instant motion was then prepared jointly in order to convey the parties' shared position.

2. As evidenced by Ms. Paulos' Motion for Judicial Notice of Related Proceedings and opening brief, the matter on appeal involves a convoluted procedural history and novel legal questions relating to issue preclusion where another court granted summary judgment on several alternative bases.

3. Additionally, the LVMPD Respondents' appellate counsel has been coping with an unshakable respiratory infection for over two weeks. The requested extension will thus allow additional time for counsel to recover and ensure that the answering brief meets the high quality standards rightfully expected in Nevada's Appellate Courts.

4. The requested extension will save Ms. Paulos' pro bono counsels' resources by allowing for a single, consolidated reply to both answering briefs.

Therefore, Ms. Paulos and the LVMPD Respondents respectfully request that the deadline for the LVMPD Respondents to file their answering brief be extended by 30 days to January 10, 2019, with the deadline for Ms. Paulos' combined reply brief to follow on February 11, 2019.

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This joint motion is submitted in good faith and for good cause as shown in accordance with NRAP 31(b).

Dated this 7th day of December, 2018.

Lewis Roca Rothgerber Christie LLP

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **JOINT MOTION REGARDING BRIEFING DEADLINES** was filed electronically with the Supreme Court of Nevada on the 7th day of December, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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

N/A

/s/ Penny Williams

Penny Williams, an employee of
Marquis Aurbach Coffing