

IN THE SUPREME COURT OF THE STATE OF NEVADA

CLARK COUNTY OFFICE OF THE
CORONER/MEDICAL EXAMINER,

Appellant,

vs.

LAS VEGAS REVIEW-JOURNAL,

Respondent.

Electronically Filed
Sep 17 2018 04:39 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SUPREME COURT CASE NO:
75095

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

**UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONDENT'S
ANSWERING BRIEF [SECOND 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 [SECOND 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 (30) days, until October 19, 2018, to file its Answering Brief, which is currently due on September, 2018. This is Respondent's second 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 17th day of September, 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

Respondent the Las Vegas Review-Journal (“Review-Journal”), by and through its undersigned counsel of record, hereby moves this Court pursuant to Nevada Rule of Appellate Procedure 31(b) for a 30-day extension of time to file its Answering Brief.

The Review-Journal’s Answering Brief was originally due August 20, 2018. The parties stipulated to one thirty (30) day extension, making the Review-Journal’s Answering Brief currently due on September 19, 2018. If the Court grants this request for a thirty (30) day extension, the Review-Journal’s Answering Brief will be due on October 19, 2018.

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 September 19, 2018 to October 19, 2018:

1. Undersigned counsel has been having health issues and was briefly hospitalized on September 14, 2018 due to a medical emergency.
2. September 5, 2018, the Las Vegas Metropolitan Police Department filed an Emergency Petition for Writ of Prohibition in *Las Vegas Metropolitan Police Department v. Eighth Judicial District Court*, Case No. 76848, a case in which the Review-Journal is a real party in interest. On September 6, 2018, this

Court issued an Order directing the Review-Journal to file a Response to the Emergency Petition by noon on September 10, 2018. This unanticipated emergency deadline required undersigned counsel to stop all other work to comply with the Court's Order.

3. In addition, the undersigned counsel has had competing deadlines in other matters. The undersigned also has upcoming competing deadlines, including a response to a motion to strike an appendix to answering brief, due on September 21, 2018 in *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, Nevada Supreme Court Case No. 74604; a hearing on September 26, 2018 in *Hartfield v. Clark County Office of the Coroner/Medical Examiner*, Eighth Judicial District Court Case No. A-18-768781-C); and a Respondent's Answering Brief due on October 8, 2018, in *Clark County School District v. Las Vegas Review-Journal*, Nevada Supreme Court Case No. 75534.

4. Respondent's Answering Brief is currently due September 19, 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 (30) days for the Answering Brief, which would move that deadline from September 19, 2018 to October 19, 2018.

On September 11, 2018, I contacted Micah Echols, counsel for Appellant regarding the need for this extension. On September 14, 2018, 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 17th day of September, 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 [SECOND REQUEST] was filed electronically with the Nevada Supreme Court on the 17th day of September, 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