

Tami D. Cowden, Esq.
Nevada Bar No. 8994
Mark E. Ferrario, Esq.
Nevada Bar No. 1625
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Telephone: (702) 792-3773
E-mail: cowdent@gtlaw.com
ferrariom@gtlaw.com

Electronically Filed
Oct 16 2019 01:21 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Attorneys for Appellants

IN THE SUPREME COURT OF THE STATE OF NEVADA

JAMES J. COTTER, JR.,

Appellants,

v.

EDWARD KANE, DOUGLAS
MCEACHERN, JUDY CODDING,
MICHAEL WROTONIAK, MARY ANN
GOULD, Personal Representative of
The Estate of William Gould, and
READING INTERNATIONAL, INC.,

Respondents.

Supreme Court Case No.: 75053

Consolidated for purposes of
disposition with Cases: 76981, 77648,
and 77733

Related to Cases: 72261, 72356, 74759

Dist. Court Case No.: A-15-719860-B

**STIPULATED MOTION TO EXTEND DEADLINE FOR
REPLY BRIEF IN CASE NO. 77733;
ANSWERING BRIEFS IN CASE NOS. 76981 AND 77648;
AND REPLY BRIEFS IN CASE NOS. 76981 AND 77648
(First Request Specific to these Briefs)**

Appellants (Case No. 77733)/Respondents (Case Nos. 76981 and 77648),
Reading International, Inc., Ellen Cotter, Margaret Cotter, Guy Adams, Douglas
McEachern, Edward Kane, Judy Coddling, Michael Wrotoniak, and Mary Ann Gould,
as Personal representative of the Estate of William Gould; and Respondent (Case
No. 77733)/Appellant (Case Nos. 76981 and 77648) James J. Cotter, Jr., by and

through their respective counsel of record, pursuant to Nev. R. App. P. 26(b)(2), hereby present their stipulated motion to extend the deadline for the filing of the Reply Brief in Case No. 77733 and the Answering Briefs in Case Nos. 76981 and 77648, from the current due date of October 28, 2019 to and including November 27, 2019, and to extend the deadline to file the Reply Briefs in Case Nos. 76981 and 77648 to and including January 6, 2020.

While prior stipulated requests for changes in the briefing schedule had included changes in the deadlines for these briefs, this is the first request for extensions made for these briefs subsequent to the filing of the antecedent briefs to which they respond (*i.e.*, the Answering Brief in Case No. 77733 and the Opening Briefs in Case Nos. 76981 and 77648).

This request is not made to delay the proceedings. The undersigned Counsel for RDI recently returned from a long-scheduled and paid for family vacation to Europe, with a persistent and lingering illness, the medication for which has interfered with her ability to devote appropriate attention to the three briefs, each addressing very different issues that arose within the proceedings below and raised on appeal. Counsel notes that she has also been forced to request and receive an extension of time to file a brief due in the Federal Circuit Court of Appeals this month. Additionally, lead counsel for RDI has been required to prepare for two scheduled trials, preventing him from devoting the requisite attention to the three briefs currently due October 28, 2019.

Counsel for James J. Cotter requests a short extension in an abundance of caution in light of the year-end holidays during which his Reply briefs in Case Nos. 76981 and 77648 would otherwise fall due based on the newly proposed November 27, 2019 deadline for respondents' Answering Briefs in these cases.

For the above reasons, the parties respectfully ask the Court to grant the requested extensions.

Dated this 16th day of October 2019.

GREENBERG TRAUIG, LLP

By: /s/Tami D. Cowden
Tami D. Cowden, Esq., Bar No. 8994
Mark E. Ferrario, Esq., Bar No. 1625
Kara B. Hendricks, Esq., Bar No. 7743
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135

*Attorneys for Reading
International, Inc.*

MORRIS LAW GROUP

By: /s/Akke Levin
Steve Morris, Bar No. 1543
Akke Levin, Bar No. 9102
411 East Bonneville Avenue, Suite 360
Las Vegas, NV 89101

*Attorneys for Appellant
James J. Cotter, Jr.*

COHEN-JOHNSON, LLC
H. Stan Johnson, Bar No. 265
255 East Warm Springs Rd, Suite 110
Las Vegas, NV 89119

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

By: /s/ Marshall Searcy
Christopher Tayback
(*admitted pro hac vice*)
Marshall Searcy
(*admitted pro hac vice*)
865 South Figueroa Street, 10th Flr.
Los Angeles, CA 90017

*Attorneys for Respondents Ellen
Cotter, Margaret Cotter, Guy
Adams, Edward Kane, Douglas
McEachern, Judy Coddling, Michael
Wrotniak, and Mary Ann Gould, as
Personal Representative of the
Estate of William Gould*