

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT,

Appellant,

vs.

LAS VEGAS REVIEW-JOURNAL, INC.,

Respondent.

Electronically Filed  
Nov 27 2019 03:33 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

SUPREME COURT CASE NO.:  
78967

DISTRICT COURT CASE NO.:  
A-18-775378-W

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S**  
**ANSWERING BRIEF**  
**(First Request)**

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S**  
**ANSWERING BRIEF**  
**(First Request)**

Respondent LAS VEGAS REVIEW-JOURNAL, INC., by and through its counsel, Margaret A. McLetchie and Alina M. Shell of McLetchie Law, hereby respectfully requests an additional thirty (30) days to file and serve Respondent's Answering Brief which is currently due on November 27, 2019. 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.

DATED this 27<sup>th</sup> day of November, 2019.

*/s/ Alina M. Shell*

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Margaret A. McLetchie, NBN 10931

Alina M. Shell, NBN 11711

**McLetchie Law**

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

*Counsel for Respondent,*

*Las Vegas Review-Journal, Inc.*

## **MEMORANDUM**

I, Alina M. Shell, am an attorney of record 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” because the undersigned counsel has obligations in several other matters which interfere with the preparation of Respondent’s Answering Brief, including but not limited to preparation for oral argument before this Court on December 2, 2019 in *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal and The Associated Press*, Supreme Court Case No. 76436; oral argument before this Court on December 3, 2019 in *Las Vegas Metropolitan Police Department v. Las Vegas Review-Journal, et al.*, Supreme Court Case No. 75518; oral argument before this Court on December 12, 2019 in *Jennifer V. Abrams, et al. v. Steve W. Sanson, et al.*, Supreme Court Case No. 73838; six depositions scheduled between December 5, 2019 and December 17, 2019 in civil matters pending in district court; an Answering Brief due on December 23, 2019 in *Canalysis Nevada, LLC v. Desert Testing, LLC*, Supreme Court Case No. 78438; as well as several deadlines in other matters.

Respondent’s Answering Brief is currently due November 27, 2019. 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 November 27, 2019 to December 27, 2019.

On November 26 and November 27, 2019, my office contacted Jackie V. Nichols and Nick D. Crosby, counsel for Appellant Las Vegas Metropolitan Police Department regarding the request for this extension. Counsel for Appellant has not responded to our inquiries.

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

DATED this 27<sup>th</sup> day of November, 2019.

/s/ Alina M. Shell

Margaret A. McLetchie, NBN 10931

Alina M. Shell, NBN 11711

**McLetchie Law**

701 East Bridger Ave., Suite 520

Las Vegas, Nevada 89101

*Counsel for Respondent,*

*Las Vegas Review-Journal, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S ANSWERING BRIEF (First Request) was filed electronically with the Nevada Supreme Court on the 27<sup>th</sup> day of November, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

*Nick D. Crosby, and Jackie V. Nichols*

***MARQUIS AURBACH COFFING***

*Counsel for Petitioner, Las Vegas Metropolitan Police Department*

*/s/ Pharan Burchfield*

Employee of McLetchie Law