

IN THE COURT OF APPEALS FOR THE STATE OF NEVADA

VENETIAN CASINO RESORT, LLC;)
LAS VEGAS SANDS, LLC,)

Appellants,

v.

EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA; THE HONORABLE
KATHLEEN DELANEY,

Respondents,

JOYE SEKERA,

Real Party in Interest)

Court of Appeals Case No.:

79689-COA

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District Court Case No.:

A788379

JOYCE SEKERA'S MOTION FOR EXTENDED BRIEFING

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Real Party in Interest, JOYCE SEKERA. ("Ms. Sekera"), by and through her attorneys, The Galliher Law Firm, hereby submits the following Motion for Extended Briefing. This Motion is based upon and supported by the following memorandum of points and authorities, the pleadings and papers on file, the exhibits attached hereto, and any argument that the Court may allow at the time of hearing.

DATED this 8th of October, 2019

THE GALLIHER LAW FIRM



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MEMORANDUM AND POINTS OF AUTHORITIES

I. LEGAL ARGUMENT

Appellants moved for a stay in this case pending the Court's decision on Appellants' Writ. In deciding whether to issue a stay the Court must consider a list of factors including "whether appellant/petitioner is likely to prevail on the merits in the appeal or writ petition." NRAP 8(c). Thus, in order to defeat Appellants'

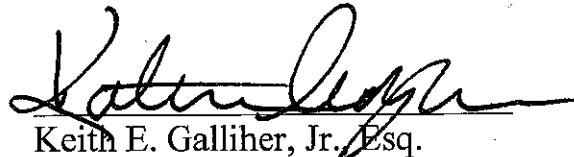
Motion for Stay Ms. Sekera must show that Appellants are not likely to prevail on the merits. In other words, Ms. Sekera must respond to all the arguments in Appellants' 36-page Writ which Ms. Sekera is unable to do in the 10-page limit proscribed in NRAP 27(d)(10).

II. CONCLUSION

Based on the foregoing, Ms. Sekera respectfully requests this Court grant her Motion for Extended briefing for her Opposition to Appellant's Motion for Stay.

DATED this 8th day of October, 2019

THE GALLIHER LAW FIRM



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CERTIFICATE OF SERVICE

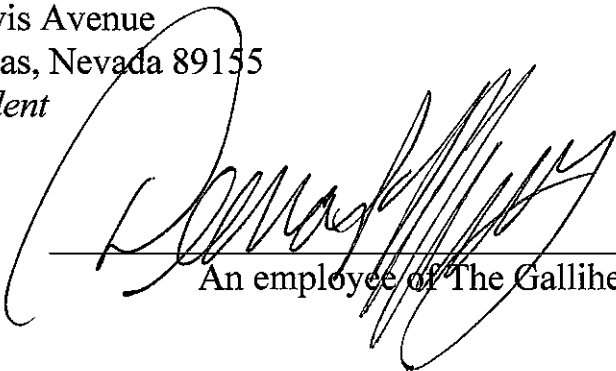
I hereby certify that I am an employee of The Galliher Law Firm and that on the 8 day of October, 2019, pursuant to N.E.F.C.R. 8, I electronically filed and served a true and correct copy of the above and foregoing **MOTION FOR EXTENDED BRIEFING** as follows:

☒ [X] by the Court's CM/ECF system which will send notification to the following;
and

☐ [] by US mail at Las Vegas, Nevada, postage prepaid thereon, addressed to the following:

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An employee of The Galliher Law Firm