

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL WHITFIELD,

Appellant,

vs.

NEVADA STATE PERSONNEL
COMMISSION; STATE OF
NEVADA DEPARTMENT OF
ADMINISTRATION; LORNA
WARD, APPEALS OFFICER;
AND THE STATE OF NEVADA
DEPARTMENT OF
CORRECTIONS, AS
EMPLOYER,

Respondents.

Electronically Filed
Jun 10 2020 03:40 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No. 79718

District Court Case No.

CV19-00641

APPEAL

**From the Second Judicial District Court
The Honorable Kathleen Drakulich, District Judge**

MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF

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Appellant Michael Whitfield, by and through his pro bono counsel, Snell & Wilmer L.L.P., moves for an extension of time in which Appellant must file his Opening Brief to, and including, July 10, 2020.

An extension of time is needed because Appellant's counsel is participating in the Partners in Pro Bono program and thereby supervising two law students who are assisting in this appeal pursuant to Supreme Court Rule 49.3. Both undersigned counsel and the student attorneys have worked diligently in preparing the Opening Brief and Appendix in this matter. However, additional time is needed to complete the briefing and allow modest time for client review.

The students needed additional time to complete final examinations. Further, COVID-19 related constraints have necessitated additional time to effectively coordinate completion of the Opening Brief. Like many others, the undersigned counsel has young children and is confronting the daily challenges of working from home while schools are closed and without childcare. The legal team has put forth substantial effort, and has a complete draft. As such, counsel does not anticipate seeking any further extensions and anticipates filing no later than the requested date of July 10, 2020.

Counsel sought and obtained a stipulation for one prior extension of thirty (30) days. This extension is not sought for the purpose of delay or any improper purpose.

Dated: June 10, 2020

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove

KELLY H. DOVE

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On June 10, 2020, I caused to be served a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF** by the method indicated:

BY ELECTRONIC SUBMISSION: submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.