

Case No. 80615

IN THE SUPREME COURT OF NEVADA

PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION,
Appellant,

Electronically Filed
Mar 30 2022 05:24 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

vs.

LAURENT HALLIER; PANORMA TOWERS I, LLC; PANORAMA TOWERS I
MESS, LCC; and M.J. DEAN CONSTRUCTION, INC.,

Respondents.

**NEVADA JUSTICE ASSOCIATION'S MOTION FOR EXTENSION
TO FILE BRIEF OF *AMICUS CURIAE* AND AMICUS BRIEF IN
SUPPORT OF APPELLANT'S ANSWER TO
PETITION FOR REHEARING**

Eighth Judicial District Court
The Honorable Susan H. Johnson, District Judge
District Court Case A-16-744146-D

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**MOTION FOR EXTENSION TO FILE BRIEF OF *AMICUS CURIAE* AND
AMICUS BRIEF IN SUPPORT OF REAL PARTY IN INTEREST'S
ANSWER TO PETITION FOR EN BANC RECONSIDERATION**

Proposed amicus Nevada Justice Association (“NJA”) requests an extension through April 11, 2022, to file its Motion for Leave to File Brief of *Amicus Curiae* and amicus brief In Support of Appellant’s Answer to Petition for Rehearing, filed on March 28, 2022. *See* NRAP 29(f). NJA also asks that this Court defer ruling on the petition until the filing of this Motion and amicus brief. This is the first request. Without an extension, the Motion and amicus brief would be due on April 4, 2022.

Proposed amicus NJA has also filed a motion for extension in the *Dekker* matter, Case No. 81459, in which very similar issues are before this Court. Granting the instant Motion would make both Motions for Leave to File Briefs of Amicus Curiae NJA in this matter and the *Dekker* matter due on the same date: April 11, 2022.

Good cause warrants the additional time. The NJA is a non-profit organization of independent lawyers who represent consumers and share the common goal of improving the civil justice system and protecting the right to a trial by jury. The NJA strives to ensure that Nevadans’ access to the courts is not diminished. Accordingly, the interpretation of NRS 11.202 and AB 421 impacts all Nevada real property owners. The proposed brief would be valuable to this Court in its decision because the NJA members’ extensive experience in litigating and protecting

property rights, including construction-defect matters, will assist this Court in addressing the arguments presented in the Petition for Rehearing. *See Powers v. United States Auto. Ass'n*, 115 Nev. 38, 41 n.2, 979 P.2d 1286, 1288 n.2 (1999) (finding that the briefs of the amici were helping in reviewing the petition for rehearing).

In addition, the NJA has had to take significant time away from this matter to deal with various unforeseen circumstances. While preparing for this amicus brief and an upcoming trial, the undersigned counsel's long-time paralegal resigned unexpectedly. Moreover, the undersigned counsel's other paralegal just underwent shoulder replacement surgery. Accordingly, the attorneys and paralegal who ordinarily would have worked on this amicus brief have been under extraordinary pressures dealing with a trial and limited staffing.

The NJA appreciates the parties' and the Court's courtesy in considering the requested extension. The requested extension will permit the NJA to address the important issues raised in this matter for this Court to review prior to ruling on the Petition for Rehearing.

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DATED: March 30, 2022

MADDOX SEGERBLOM CANEPA

/s/ Eva G. Segerblom

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CERTIFICATE OF SERVICE

I certify that on the 30th day of March, 2022, I caused to be served via the District Court's e-filing system and pursuant to NRAP 25(b) and NEFCR 9, and electronically filed the foregoing "MOTION FOR EXTENSION TO FILE BRIEF OF AMICUS CURIAE AND AMICUS BRIEF IN SUPPORT OF APPELLANT'S ANSWER TO PETITION FOR REHEARING" with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-filing system (Eflex). Participants in the case who are registered Eflex users will be served by the Eflex system as follows:

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