Sean K. Claggett, Esq. Nevada Bar No. 8407 William T. Sykes, Esq. Nevada Bar No. 9916 Micah S. Echols, Esq. Nevada Bar No. 8437 **Claggett & Sykes Law Firm** 4101 Meadows Lane, Suite 100 Las Vegas, Nevada 89107 (702) 655-2346 – Telephone (702) 655-3763 – Facsimile micah@claggettlaw.com Attorneys for Real Party in Interest, Joyce Sekera

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IN THE SUPREME COURT OF THE STATE OF NEVADA

Case No.:

80816

VENETIAN CASINO RESORT, LLC: LAS VEGAS SANDS, LLC,

Petitioners,

VS.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA. IN AND FOR THE COUNTY OF CLARK: AND THE HONORABLE KATHLEEN DELANEY, DISTRICT JUDGE,

Respondents,

and

JOYCE SEKERA.

Real Party in Interest.

MOTION FOR EXTENSION OF TIME TO FILE REAL PARTY IN INTEREST PETITION FOR REVIEW (Second Request)

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Real Party in Interest, Joyce Sekera ("Sekera"), by and through her counsel of record, Claggett & Sykes Law Firm, hereby moves this Honorable Court for an extension of two weeks to file Sekera's petition for review.

Sekera's petition for review was originally due June 23, 2020. This Court previously granted one 14-day telephonic extension of time to July 21, 2020. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of two weeks, Sekera's petition for review will be due on Tuesday, August 4, 2020. Good cause exists for allowing Sekera to extend the filing deadline until August 4, 2020:

On July 9, 2020, all individuals in the Claggett & Sykes Law Firm building were abruptly evacuated, due to a positive COVID-19 test from one of the firm's receptionists. The firm had partially reopened with alternating days for different groups of staff members, with the option to work remotely. However, the receptionists have not had the option to work remotely in order to receive mail and other deliveries. In an abundance of caution, no one was permitted to re-enter the building until after a deep cleaning had been performed. In addition, Mr. Echols and his team were mandated to self-quarantine at home for 14 days before returning to the office.

On July 14, 2020, Claggett & Sykes building was again exposed to a positive COVID-19 test from an employee of a firm that shares office space with Claggett & Sykes.

Despite these setbacks, Mr. Echols has worked diligently to meet the current deadline to file and serve Sekera's petition for review. However, this unexpected building evacuation and mandated quarantine have caused an unforeseen delay. Given the complex nature and numerous issues raised by this original proceeding, it is vital that Sekera have sufficient time to review and address the issues prior to filing.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b). Therefore, Sekera respectfully request that this Court grant this motion for an extension of two weeks to file and serve the petition for review, until August 4, 2020.

DATED this 21st day of July, 2020.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols

Micah S. Echols, Esq.
Nevada Bar No. 8437
4101 Meadows Lane, Suite 100
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Attorneys for Real Party in Interest,
Joyce Sekera

CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR EXTENSION OF TIME

TO FILE REAL PARTY IN INTEREST PETITION FOR REVIEW

(SECOND REQUEST) was filed electronically with the Nevada Supreme Court on the 21st day of July, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Michael A. Royal, Esq. Gregory A. Miles, Esq.

/s/ Anna Gres1

Anna Gresl, an employee of Claggett & Sykes Law Firm