

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

RUTH L. COHEN, AN INDIVIDUAL,

Appellant,

vs.

PAUL S. PADDA, AN INDIVIDUAL;  
AND PAUL PADDA LAW, PLLC, A  
NEVADA PROFESSIONAL LIMITED  
LIABILITY COMPANY,

Respondents.

Case No. 81018

Electronically Filed  
Mar 17 2021 12:08 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE  
TO FILE AMICUS BRIEF OF CLAGGETT & SYKES LAW FIRM**  
(First Request)

Claggett & Sykes Law Firm, a proposed *amicus curiae*, is a law firm in Las Vegas, Nevada. Claggett & Sykes Law Firm is represented in this matter by Sean K. Claggett, Esq.; William T. Sykes, Esq.; Matthew S. Granda, Esq.; and Micah S. Echols, Esq. and hereby moves this Court pursuant to NRAP 26(1)(a) for an extension of time of 30 days from the Court's Order to file its motion for leave to file an amicus brief and the proposed amicus brief.

Under this Court's rules, a non-governmental *amicus curiae* "may file a brief only by leave of court granted on motion or at the court's request or if accompanied by written consent of all parties." *See* NRAP 29(a). Both the proposed amicus brief

and the motion for leave must be filed within seven days of the brief of the party being supported. *See* NRAP 29(f). However, “[t]he court may grant leave for later filing, specifying the time within which the opposing party may answer.” *Id.*

Here, Respondents, Paul S. Padda and Paul Padda Law, PLLC, filed their answering brief on March 10, 2021. Thus, Claggett & Sykes Law Firm’s proposed amicus brief (accompanied by its motion for leave) would be due on Wednesday March 17, 2021. No request for additional time has been denied or denied in part.

Good cause exists for allowing Claggett & Sykes Law Firm to extend the filing deadline for both its motion for leave and proposed amicus brief until 30 days after this Court’s order for the following reason:

1. Counsel will need time to familiarize themselves with the record, the legal arguments, and the briefing currently before the Court.

2. Claggett & Sykes Law Firm principally works on contingency fees and often has fee-splitting agreements with other lawyers, and it is anticipated that several other law firms with the same business model will join the amicus brief at the time the motion for leave and the proposed brief are filed with this Court. The additional time will allow other law firms to review the draft of the brief to potentially join in the brief.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1)(a). For the foregoing reasons, Claggett & Sykes Law Firm respectfully moves this Court for an extension of time to file its motion for leave to file an amicus brief and its proposed brief to no later than 30 days after this Court's Order.

DATED this 17th day of March 2021.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Sean K. Claggett, Esq.

Nevada Bar No. 8407

William T. Sykes, Esq.

Nevada Bar No. 9916

Matthew S. Granda, Esq.

Nevada Bar No. 12753

Micah S. Echols, Esq.

Nevada Bar No. 8437

4101 Meadows Lane, Suite 100

Las Vegas, Nevada 89107

(702) 655-2346 – Telephone

*Attorneys for Amicus Curiae*

*Claggett & Sykes Law Firm*

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS BRIEF OF CLAGGETT & SYKES LAW FIRM (First Request)** was filed electronically with the Supreme Court of Nevada on the 17th day of March 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

### **Respondents – Paul Padda Law, PLLC and Paul S. Padda**

Nikki L. Baker (Peterson Baker, PLLC)  
Joel D. Henriod (Lewis Roca Rothgerber Christie LLP/Las Vegas)  
Paul S. Padda (Paul Padda Law, PLLC)  
J. Stephen Peek (Former) (Holland & Hart LLP/Las Vegas)  
Tamara Beatty Peterson (Peterson Baker, PLLC)  
Daniel F. Polsenberg (Lewis Roca Rothgerber Christie LLP/Las Vegas)  
Ryan A. Semerad (Donald L. Fuller, Attorney at Law, LLC)  
Abraham G. Smith (Lewis Roca Rothgerber Christie LLP/Las Vegas)  
Jessica E. Whelan (Holland & Hart LLP/Las Vegas)

### **Appellant – Ruth L. Cohen**

Donald J. Campbell (Campbell & Williams)  
Philip R. Erwin (Campbell & Williams)  
Dale A. Hayes, Jr. (Hayes Wakayama)  
Dale A. Hayes (Hayes Wakayama)  
Samuel R. Mirkovich (Campbell & Williams)  
Liane K. Wakayama (Hayes Wakayama)

/s/ Anna Gresl

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Anna Gresl, an employee of  
Claggett & Sykes Law Firm