

IN THE SUPREME COURT OF THE STATE OF NEVADA

DEKKER/PERICH/SABATINI LTD.;
NEVADA BY DESIGN, LLC, D/B/A
NEVADA BY DESIGN; MELROY
ENGINEERING, INC., D/B/A MSA
ENGINEERING CONSULTANTS; JW
ZUNINO & ASSOCIATES, LLC; AND
NINYO AND MOORE
GEOTECHNICAL CONSULTANTS;
RICHARDSON CONSTRUCTION,
INC., THE GUARANTEE COMPANY
OF NORTH AMERICA USA; AND
JACKSON FAMILY PARTNERSHIP
LLC D/B/A STARGATE PLUMBING,
Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE TREVOR L. ATKIN,
DISTRICT JUDGE,

Respondents,

and

CITY OF NORTH LAS VEGAS,
Real Party in Interest.

Electronically Filed
Oct 29 2020 02:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case

No. 81459

District Court Case

No. A-19-798346-C

**PETITION FOR WRIT OF MANDAMUS
From the Eighth Judicial District Court
The Honorable Trevor L. Atkin**

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
PETITION FOR WRIT OF MANDAMUS
(FIRST REQUEST BY MOTION)**

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Attorneys for Real Party in Interest City of North Las Vegas

Pursuant to NRAP 31(b)(3), Real Party in Interest City of North Las Vegas (“CNLV”) moves to extend the time to file an answer to the Petition for a Writ of Mandamus or, Alternatively, Prohibition by 14 days to, and including, **November 16, 2020**. CNLV previously obtained the 14-day telephonic extension for its answer, which extended the original October 16, 2020 deadline¹ to the current November 2 deadline. CNLV has not requested any other extensions.

An extension is necessary because CNLV’s lead attorney in this case, Richard Gordon, experienced a death in the family, severely limiting his ability to draft, review, and revise the answer. Additionally, COVID-19 related constraints have necessitated additional time to effectively coordinate completion of the brief. CNLV also notes that granting the instant motion would, along with the telephonic extension already applied, extend the *original* deadline by 28 days, which is less than the 30 days that the parties could have stipulated to at the outset.

¹ On September 18, 2020, this Court directed CNLV to answer the petition within 28 days of that order, thus setting the original deadline as October 28.

This request is not intended for the purpose of delay or any improper purpose. CNLV intends to file its brief within the requested time and does not anticipate a need for any further extension of time.

Conclusion

Based on the foregoing, CNLV respectfully requests that this Court grant its motion and extend the deadline for filing its answer to, and including, **November 16, 2020**.

DATED: October 29, 2020

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove

Richard C. Gordon

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City of North Las Vegas

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 October 29, 2020, I caused to be served a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO PETITION FOR WRIT OF MANDAMUS** upon the following by the method indicated:

- ☐ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the e-mail addresses set forth below and/or included on the Court's Service List for the above-referenced case.
- ☒ **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.