

In the Supreme Court 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; NINYO & 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
Jan 05 2022 09:18 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION TO FILE AMICUS
BRIEF IN SUPPORT OF *EN BANC* RECONSIDERATION**

Proposed amici Laurent Hallier, Panorama Towers I, LLC,
Panorama Towers I Mezz, LLC, and M.J. Dean Construction, Inc. request
an extension through January 28, 2022 to file its brief in support of the
petition for *en banc* reconsideration. NRAP 29(f). This is the second such

request. Without an extension, the amicus brief would be due January 5, 2022.

Amici regret having to make this request, but extraordinary circumstances and extreme need necessitate the extension. On top of the ordinary press and staffing shortages associated with the holiday season, the attorney primarily responsible for finalizing the amicus brief has fallen ill. This was after he had to cancel other holiday plans and take significant time away from work—not just this brief—to care for his wife, five-year-old daughter, and three-month-old son, all of whom became ill one after another in the span of the last few weeks. In addition, another appellate counsel has had to isolate following exposure to a COVID-positive individual in his family.

Notwithstanding counsel's illness, they have prepared a draft of the amicus brief and motion for leave and pledge to file within the requested extension. The extension request coincides with the requested deadline for filing a petition for rehearing in the *Panorama Towers Condo. Ass'n v. Hallier*, Docket No. 80615, which presents similar issues and relies on the opinion in this writ proceeding.

Amici appreciate the parties' and this Court's extraordinary courtesy in considering this extension.

Dated this 5th day of January, 2022.

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By: /s/Abraham G. Smith

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CERTIFICATE OF SERVICE

I certify that on January 5, 2022, I submitted the foregoing “Motion for Extension to File Amicus Brief in Support of *En Banc* Reconsideration” for filing *via* the Court’s eFlex electronic filing system.

Electronic notification will be sent to the following:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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