

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
Feb 18 2022 12:04 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**

**STIPULATION TO EXTEND DEADLINE FOR FILING AN
ANSWER TO THE PETITION FOR EN BANC
RECONSIDERATION**

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IT IS HEREBY STIPULATED AND AGREED UPON by Petitioners 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 and Moore Geotechnical Consultants, Richardson Construction, Inc., The Guarantee Company of North America USA, and Jackson Family Partnership LLC d/b/a Stargate Plumbing (collectively, “Petitioners”) and Real Party in Interest City of North Las Vegas (“CNLV” and collectively with Petitioners, “Parties”), by and through their respective counsel, as follows:

1. CNLV’s answer to the petition for *en banc* reconsideration (the “Answer”) is currently due on February 18, 2022. The Parties stipulate and respectfully request that the deadline to file and serve the Answer be extended 31 days to Monday, March 21, 2022.

2. There is good cause to extend the deadline for CNLV to file its Answer. Specifically, CNLV’s lead counsel is concluding discovery in a large commercial litigation dispute and numerous depositions are scheduled within the next three weeks. In addition, counsel is responding to several deadlines with this Court in other cases that

significantly limit their ability to work on the Answer. Finally, one of CNLV's attorneys had a serious family medical issue arise that has impacted counsel's ability to prepare the Answer under the current deadlines. CNLV does not anticipate needing any further extensions for its Answer beyond this Stipulation.

3. CNLV acknowledges that pursuant to NRAP 31(b)(1) it is precluded from submitting a telephonic request for another extension of time to file its Answer beyond this Stipulation

4. CNLV has not previously requested an extension to answer the petition for *en banc* reconsideration.

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Dated: February 18, 2022

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/s/ Richard C. Gordon

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