

**IN THE COURT OF APPEALS OF THE STATE OF NEVADA**

KEOLIS TRANSIT SERVICES, LLC,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA IN AND FOR THE  
COUNTY OF CLARK, AND THE  
HONORABLE RICHARD SCOTTI,  
DEPT. II,

Respondents,

SHAY TOTH,

Real Party in Interest.

Case No. 81637-COA Electronically Filed  
Jan 11 2021 06:47 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE  
MOTION FOR LEAVE TO FILE  
AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION**

The Nevada Justice Association (“NJA”), represented in this matter by Micah S. Echols, Esq. of Claggett & Sykes Law Firm, and A. J. Sharp, Esq. of Sharp Law Center, hereby file this reply in support of their motion for an extension of 10 days to file the motion for leave to file amicus brief of the NJA. If the motion is granted, NJA’s motion for leave to file an amicus brief and the proposed brief would have

been due on January 7, 2021. NJA's motion for leave to file an amicus brief and the proposed brief were filed on January 7, 2021.

NJA has demonstrated good cause for this Court to grant its requested second extension of 10 days to file its motion for leave to file an amicus brief, along with its proposed brief. Petitioner's unnecessarily minimizes the unanticipated circumstances that Mr. Sharp is facing that demonstrate good cause and justify an extension.

At the time NJA filed its second motion for an extension of 10 days to file its motion for leave to file an amicus brief, along with its proposed brief on December 28, 2020, Mr. Sharp had a personal emergency and was unexpectedly required to travel to Portland, Oregon to assist with an elderly family friend, who was in dire need of Mr. Sharp assistance.

Petitioner further challenges the requested 10-day extension by proclaiming that Claggett & Sykes Law Firm has no less than 15 attorneys employed, who could have been working on drafting the motion and brief. However, Mr. Echols is the only appellate attorney within the firm. Furthermore, Mr. Echols or any of the other attorneys would require research of the issue, which would have taken longer than the requested 10 days. Additionally, amicus brief filed by the NJA must go through a committee approval process and cannot simply be filed, as the defense suggests.

In summary, NJA has demonstrated good cause for a 10-day extension of time to file its motion for leave to file an amicus brief, along with its proposed brief. Therefore, NJA respectfully request that this Court grant its requested extension of 10 days, until January 7, 2021, to file its motion for leave to file an amicus brief, along with its proposed brief.

Dated this 11th day of January 2021.

**CLAGGETT & SYKES LAW FIRM**

*/s/ Micah S. Echols*

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Micah S. Echols, Esq.  
Nevada Bar No. 8437  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
*Attorneys for Amicus Curiae*  
*Nevada Justice Association*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION** was filed electronically with the Supreme Court of Nevada on the 11th day of January 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Cliff W. Marcek  
Boyd B. Moss III  
Andrew R. Muehlbauer  
Sean P. Connell

I further certify that the foregoing document was mailed via U.S. Mail, first-class postage fully prepaid, to the following:

Honorable Richard Scotti, District Judge  
Eighth Judicial District Court, Department 2  
200 Lewis Avenue  
Las Vegas, Nevada 89101

*/s/ Anna Gresl*

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Anna Gresl, an employee of  
Claggett & Sykes Law Firm