

IN THE SUPREME COURT OF THE STATE OF NEVADA

LAS VEGAS REVIEW-JOURNAL,

Appellant,

vs.

CITY OF HENDERSON,

Respondent.

Electronically Filed
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Elizabeth A. Brown
Clerk of Supreme Court

Case No. 81758
DC Case No. A-16-747289-W

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S
REPLY BRIEF [FIRST REQUEST]**

Appellant Las Vegas Review-Journal hereby respectfully requests forty-five (45) days, until May 17, 2021, to file its Reply Brief, which is currently due on April 1, 2021. This is Appellant's first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein. Brian Reeve, counsel for Respondent, has indicated Respondent has no objection to this request.

DATED this 25th day of March, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

Alina M. Shell, Nevada Bar No. 11711

MCLETCHIE LAW

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Counsel for Appellant

MEMORANDUM

I, Margaret A. McLetchie, am an attorney of record in the above-captioned case.

This Court may “[f]or good cause” extend the time “prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires.” NRAP 26(b)(1)(A). Here, there is “good cause” because the undersigned counsel has other, competing (and unexpected) obligations that interfere with the preparation of Appellant’s Reply Brief. Specifically, undersigned counsel has ongoing daily obligations during the current 2021 Nevada legislative session as part of volunteer work for the Nevada Open Government Coalition as well as deadlines in other matters, including oppositions to four motions for summary judgment in a state court matter which are due on March 29, 2021, a response to a motion for summary judgment in a federal matter which is due on April 7, 2021, and several hearings on contested matters in state court. Further, the undersigned owns and manages a small firm, and is in the midst of an office relocation.

Appellant’s Reply Brief is currently due April 1, 2021. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of forty-five (45) days for the Reply Brief, which would move that deadline from April 1, 2021 to May 17,

2021.

On March 23, 2021, Appellant counsel Alina M. Shell contacted Brian Reeve, counsel for Respondent, regarding the need for this extension. Mr. Reeve indicated Respondent has no objection to this request. The undersigned appreciates opposing counsel's professional courtesy.

The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 25th day of March, 2021.

/s/ Margaret A. McLetchie

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Counsel for Appellant

CERTIFICATE OF SERVICE

I certify that I am an employee of McLetchie Law and that on this 25th day of March, 2021 the UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT’S REPLY BRIEF [FIRST REQUEST] was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the Master Service List as follows:

Nicholas G. Vaskov, Brandon P. Kemble, and Brian R. Reeve
CITY OF HENDERSON’S ATTORNEY OFFICE
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Counsel for Respondent City of Henderson

/s/ Pharan Burchfield
Employee, McLetchie Law