

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE LAS VEGAS REVIEW
JOURNAL,

Appellant,

vs.

CITY OF HENDERSON,

Respondent.

Electronically Filed
Jan 24 2022 03:09 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.: 81758

**UNOPPOSED MOTION FOR EXTENSION TO FILE PETITION FOR
REHEARING [SECOND REQUEST]**

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**UNOPPOSED MOTION FOR EXTENSION TO FILE PETITION FOR
REHEARING [SECOND REQUEST]**

Appellant LAS VEGAS REVIEW-JOURNAL, by and through its counsel, Margaret A. McLetchie of McLetchie Law, hereby respectfully requests twenty-one (21) days, until February 14, 2022, to file its Petition for Rehearing, which is currently due on January 24, 2022. This is Appellant's second request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein. Brian R. Reeve, Assistant City Attorney for Henderson and counsel for Respondent, has indicated Respondent has no objection to this request.

DATED this 24th day of January, 2022.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

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Counsel for The Las Vegas Review-Journal

MEMORANDUM

Appellant the Las Vegas Review-Journal (“Review-Journal”), by and through its undersigned counsel of record, hereby moves this Court pursuant to Nevada Rule of Appellate Procedure 31(b) for a 21-day extension of time to file its Petition for Rehearing.

The Review-Journal’s Petition for Rehearing was originally due January 10, 2022. The Court granted the Review-Journal’s first telephonic request for a fourteen (14) day extension, making the Review-Journal’s Petition for Rehearing currently due on January 24, 2022. (*See* Doc. No. 21-01072.)

Here, good cause exists to extend the deadline from January 24, 2022 to February 14, 2022:

1. On January 12, 2022, undersigned counsel began suffering symptoms of fever, cough, headache, loss of voice, and fatigue which rendered her unable to perform work.
2. That same day, undersigned counsel tested positive for COVID-19.
3. Undersigned counsel was rendered practically incapable of performing legal work from January 12 through January 17, 2022, while recovering, but diligently attempted to meet or extend deadlines in her matters with the assistance of the other two attorneys at McLetchie Law.

4. Undersigned counsel quarantined herself until testing negative on January 18, 2022, and has continued to perform legal work since then despite lingering symptoms of COVID-19, including fatigue.

5. On January 21, 2022, Leo S. Wolpert, an associate at undersigned's firm, tested positive for COVID-19.

6. That same day, Mr. Wolpert developed symptoms of headache, fatigue and chills which rendered him practically incapable of performing legal work from January 21 through January 23.

7. Mr. Wolpert is currently quarantining himself and will attempt to work from home while recovering.

8. On January 24, 2022, undersigned counsel Brian R. Reeve, Assistant City Attorney for the City of Henderson and 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.

9. Appellant's Petition for Rehearing is currently due January 24, 2022.

An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of twenty (21) days for the Petition for Rehearing, which would move that deadline from January 24, 2022, to February 14, 2022.

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

DATED this 24th day of January, 2022.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

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Counsel for The Las Vegas Review-Journal

CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION FOR EXTENSION TO FILE PETITION FOR REHEARING [SECOND REQUEST] was filed electronically with the Nevada Supreme Court on the 24th day of January, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

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/s/ Judy S. Sanderlin

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