

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

TROY MOATS,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA, IN AND FOR THE  
COUNTY OF CLARK AND THE  
HONORABLE JUDGE ADRIANA  
ESCOBAR,

Respondents,

TROY BURGESS,

Real Party in Interest.

Case No. 81912

Electronically Filed  
Oct 22 2020 03:32 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE**  
**AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION**  
**(First Request)**

The Nevada Justice Association (“NJA”), an *amicus curiae*, is a non-profit organization of independent lawyers in the State of Nevada. The *amicus curiae* is represented by Micah S. Echols, Esq., of Claggett & Sykes Law Firm, and Thomas W. Stewart, Esq., of The Powell Law Firm in this matter, hereby moves this Court pursuant to NRAP 26(1)(a) for a motion for extension of time of 30 days from the

Court's order to file its amicus brief.

NJA just appeared in this case on October 20, 2020. The amicus brief was originally due on October 16, 2020. No other requests for an extension of time have been requested for this brief. Good cause exists for allowing NJA to extend the filing deadline of the amicus brief until 30 days from the date of the Court's order resolving NJA's motion for extension and to allow the late filing of its motion for extension of time for the following reasons:

1. Micah S. Echols, Esq., and Thomas W. Stewart, Esq. entered an appearance in this matter on October 20, 2020.

2. Mr. Echols is counsel in a case that is currently scheduled for trial on October 26, 2020, and is scheduled to conclude November 6, 2020, in State of New Mexico, County of Rio Arriba, *Shasta N. Inman, as Guardian ad Litem of G.S., a minor child vs. Acadia Healthcare, et al.*, Case No. D-117-CV-2019-00136. Mr. Echols will be in court from October 26, 2020 until the case concludes. Furthermore, counsel will need to be prepared in the event post-trial motions are necessary. Therefore, counsel will be unable to devote sufficient time to drafting the amicus brief.

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3. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1)(a). For the foregoing reasons, NJA respectfully requests a 30-day extension of time from the date of the Court's order resolving NJA's motion for extension of time, within which to file the amicus brief.

DATED this 22nd day of October, 2020.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols, Esq.

Nevada Bar No. 8437

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*Attorneys for Amicus Curiae*

*Nevada Justice Association*

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *MOTION FOR EXTENSION OF TIME TO FILE AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION (First Request)* was filed electronically with the Supreme Court of Nevada on the 22nd day of October, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Marjorie L. Hauf  
Matthew G. Pfau  
Caitlin J. Lorelli  
Thomas E. Winner

I further certify that the foregoing document were mailed via U.S. Mail to the following:

Honorable Adriana Escobar, District Court Judge  
Eighth Judicial District Court, Department 14  
200 Lewis Avenue  
Las Vegas, Nevada 89155

/s/ Anna Gresl

Anna Gresl, an employee of  
Claggett & Sykes Law Firm