

Case No. 81912

In the Supreme Court of Nevada

Troy Moats,

Petitioner,

vs.

The Eighth Judicial District Court
of the State of Nevada ex rel the
County of Clark and the
Honorable Judge Adriana Escobar,
Respondents.

Troy Burgess,

Real Party in Interest.

Electronically Filed
Jan 12 2021 05:01 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Motion for Extension to File Answering Brief

Real Party in Interest, Troy Burgess, requests a 30-day extension through Friday, February 12, 2021 to file his answering brief as directed by the Supreme Court of the State of Nevada in its Order Directing Answer and Granting Amicus Motion. NRAP 31(b)(3). This is the first such motion and no extension of time has been previously granted. The answering brief is due January 13, 2021.

Additional time is necessary for a few reasons. First, Real Party in Interest received notice of the Order directing his answer on December 16, 2020 and the

time to prepare the same coincided with the holidays and pre-planned office closures. Second, logistical handicaps arising from the COVID-19 outbreaks have led to a general backlog of cases entrusted to undersigned counsel. Although capacity increases as everyone grows more proficient at working and collaborating remotely, the awkward process is a slog causing slower output. Third, counsel for Real Party in Interest both have had family emergencies arise during this time, both due to COVID-19 and other health issues, and it has required ounsels to dedicate significant time to assist their families with medical treatment. Fourth, the answering brief must address both the Petitioner's Petition for a Writ of Mandamus or Other Extraordinary Relief, and the Amicus Curiae Brief of the Nevada Justice Association, lengthening the legal analysis. We appreciate the Court's understanding in light of these unprecedented circumstances and the specific circumstances of the instant matter.

Dated this 12th day of January, 2021.

WINNER & SHERROD

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of January, 2021, I served a true and accurate copy of the **Motion for Extension to File Answering Brief** on the following by [XX] electronic service via the Court' E-Flex system [] hand delivery [] overnight delivery [] fax [] fax and mail [XX] mailing by depositing with the U.S. mail in Las Vegas, Nevada, enclosed in a sealed envelope with first class postage prepaid, addressed as follows:

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An employee of WINNER & SHERROD