

**IN THE SUPREME COURT OF THE STATE 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.

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**Troy Burgess,**

Real Party in Interest.

Supreme Court No.: 81912

Electronically Filed  
Apr 05 2021 04:52 p.m.  
Elizabeth A. Brown  
District Court No. 18-01645-00  
Clerk of Supreme Court

**PETITIONER'S MOTION TO FILE REPLY IN EXCESS OF NRAP  
21(D) LIMITS**

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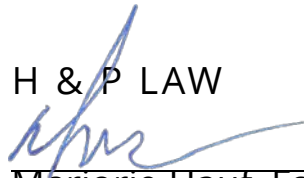
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*Attorneys for Troy Moats, Petitioner*

Petitioner, Troy Moats, by and through his attorneys of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq. hereby moves this Court for Leave to File his Reply to Answer to Petition for Writ of Mandamus exceeding the page and word limits set of in NRAP 21(d), NRAP 27(a) and (d), and NRAP 32(a)(7)(D).

DATED this 5th day of April 2021.

H & P LAW



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Marjorie Hauf, Esq.  
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Attorneys for Petitioner,  
*Troy Moats*

Petitioner, TROY MOATS, hereby hereby moves this Court for Leave to File his Reply to Answer to Petition for Writ of Mandamus exceeding the page and word limits set of in NRAP 21(d), NRAP 27(a) and (d), and NRAP 32(a)(7)(D).

Motions to exceed page and word limits will be granted upon showing of diligence and good cause.<sup>1</sup> Good cause is a substantial reason that

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<sup>1</sup> *Blandino v. Eighth Judicial Dist. Court of Nev.*, 466 P.3d 539 (Nev. 2020).

affords a legal excuse.<sup>2</sup> In the instant matter, Respondent filed a 31-page Answering Brief, with substantial case law and statutes. Petitioner needed to appropriately address all arguments mentioned therein, including analyzing similar statutes across the nation. Such required surpassing the NRAP's word limit.

Petitioner attempted to pare down the Reply as necessary, but unfortunately, the history of this case, relevant facts, and applicable law did not permit reducing the word count further. Petitioner's Reply to Answer to Petition for Writ of Mandamus is 8,089 words of body text (excluding the table of contents, table of authorities, and certificate of compliance) and 55 pages in total.

Petitioner hereby requests this Court acknowledge good cause and due diligence to file his Reply to Answer to Petition for Writ of Mandamus more than the Rule limit.

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<sup>2</sup> *Brown v. McDaniel*, 130 Nev. 565, 569 (2014)(citing *Hathaway v. State*, 119 Nev. 248, 252 (2003)).

DATED this 5th day of April 2021.

H & P LAW



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Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439

Attorney for Petitioner,  
*Troy Moats*

# CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April 2021 service of the foregoing PETITIONER'S MOTION TO FILE REPLY IN EXCESS OF NRAP 21(D) LIMITS was made by required electronic service and U.S. Mail to the following individuals:

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The Eighth Judicial District Court  
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County of Clark and the Honorable  
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