

IN THE SUPREME COURT OF THE STATE OF NEVADA

NEVADA COLLECTORS
ASSOCIATION, a Nevada non-profit
corporation,

Appellant,

v.

SANDY O'LAUGHLIN, in her
official capacity as Commissioner of
the State of Nevada Department of
Business and Industry and Financial
Institution Division; STATE OF
NEVADA DEPARTMENT OF
BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS
DIVISION; JUSTICE COURT OF
LAS VEGAS TOWNSHIP; DOE
DEFENDANTS 1 through 20; and
ROE ENTITY DEFENDANTS 1
through 20,

Respondents.

Supreme Court Case No.: 81930

District Court Case No.: A-19-805334-C

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Appeal from Eighth Judicial District Court, State of Nevada, County of Clark
The Honorable Nancy L. Allf, District Judge

RESPONSE TO JUSTICE COURT'S REQUEST FOR EXTENSION

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Appellant Nevada Collectors Association (“NCA”), by and through its attorneys at the law firm Brownstein Hyatt Farber Schreck, LLP, hereby responds to Respondent Justice Court of Las Vegas Township’s (“Justice Court”) Request for Extension.

Because NCA’s opening brief was filed on September 23, 2021, Justice Court’s answering brief was due **October 25, 2021**. NRAP 31(a)(1)(B). If Justice Court needed additional time to file its answering brief, it could have requested an automatic 14-day telephonic extension. NRAP 31(b)(1). Indeed, Respondent State of Nevada Department of Business and Industry, Financial Institutions Division obtained a timely telephonic extension on October 21, 2021. Instead, Justice Court waited until **after** the due date for its answer brief to file a one-sentence “request” for an extension.

Justice Court’s “request” for an extension is improper for two reasons. First, the “request” is untimely because it was filed **after** the due date for Justice Court’s answering brief. *See* NRAP 31(b)(3) (“A motion for extension of time for filing a brief may be made no later than the due date for the brief....”). Not surprisingly, Justice Court neglected to mention this fact in its cryptic one-sentence “request.” Second, Justice Court’s one-sentence “request” does not include any of the necessary items listed in NRAP 31(b)(3)(A), including the grounds for why an extension is

necessary. For these reasons, Justice Court’s “request” for an extension should be denied.

DATED this 29th day of October, 2021.

/s/

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CERTIFICATE OF SERVICE

Pursuant to Nevada Rule of Appellate Procedure 25(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **RESPONSE TO JUSTICE COURT'S REQUEST FOR EXTENSION** was served by submitting electronically for filing and/or service with Supreme Court of Nevada's EFlex Filing system and serving all parties with an email address on record, as indicated below, pursuant to Rule 8 of the N.E.F.C.R. on the 28th day of October, 2021, to the addresses shown below:

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