

1 following a Jury Trial in the underlying action, *Sean Fitzgerald v. Hillsboro Enterprises, Inc. et*
2 *al, A-15-716570-C*. The Notice of Appeal was filed on September 27, 2019. Thereafter, the matter
3 was placed in the Settlement Program. A settlement was not reached and therefore the matter was
4 place back on a briefing schedule.

5 On March 12, 2020, Governor Steve Sisolak, issued a Declaration of Emergency in
6 response to the COVID-19 pandemic. On March 13, 2020 President Donald Trump issued a
7 nationwide emergency pursuant to Sec 501(b) of the Robert T. Stafford Disaster Relief and
8 Emergency Assistance Act, 42 U.S.C. 5121-5207 (the "Stafford Act"). On March 20, 2020
9 Governor Sisolak issued Directive 003 and further ordered the closure of all non-essential
10 businesses and restricted the activities of essential businesses to reduce opportunities for
11 interpersonal contact. On March 31, 2020 Governor Sisolak issued Directive 10 to reinforce and
12 clarity that Nevadans must avoid unnecessary inter-personal contact to lower the rate of disease
13 transmission. Finally, on April 8, 2020 Governor Sisolak issued Directive 13, to further enforce
14 social distancing requirements.

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16 HURTIK LAW and ASSOCIATES LTD., like other law firms, has been forced to deal
17 with reduced staff and limited contact with clients. Ms. Hurtik is a care giver for her elderly parents
18 and therefore has been diligent concerning exposing herself to anyone with the COVID-19 virus.
19 As a result, she has not been able to meet with her clients to review and discuss the Opening Brief
20 of their appeal. We understand that the Court would not normally consider staffing issues when
21 ruling on an Extension of Time, we are not operating in a normal environment.

22 Furthermore, there is no certainty as to how long the current state of emergency will last.
23 The current social distancing guidelines are in effect until April 30th, 2020 with a high degree of

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1 probability that they be extended well into May 2020. Therefore, the Appellants request an
2 Extension of Time to File Opening Brief for Sixty (60) days.

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4 DATED this 9th day of April, 2020.

6 **HURTIK LAW & ASSOCIATES**

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