

**The Powell Law Firm**

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Elizabeth A. Brown  
Clerk of Supreme Court

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

EDGARDO P. YUSI; and KEOLIS  
TRANSIT SERVICES, LLC,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA, IN AND FOR THE  
COUNTY OF CLARK; AND THE  
HONORABLE NANCY L. ALLF,  
DISTRICT JUDGE,

Respondents,

and

HEATHER FELSNER,

Real Party in Interest.

Docket No. 82625

**MOTION FOR EXTENSION OF  
TIME TO FILE ANSWER**

**(First Request)**

Real party in interest Heather Felsner moves pursuant NRAP 26(1)(a) for a 30-day extension to file her answer to this writ petition. No other requests for an extension of time have been requested for this answer, which is currently due May 3, 2021. If the Court grants this motion, the answer will be due June 2,

2021. For the following reasons, good cause exists for allowing Felsner to extend the filing deadline of the answer for 30 days:

1. This writ petition presents complex questions of first impression implicating the separation of powers, statutory interpretation, and the proper method of analysis for directly contradictory provisions of a statute and rule of civil procedure.

2. In order to concisely address the complex issues raised by this original proceeding, Felsner will need the additional time to complete the answer and circulate a draft.

3. The additional time will also allow any requested revisions to be incorporated into Felsner's answer prior to finalization and submission to this Court for filing.

Therefore, real party in interest Heather Felsner respectfully requests that this Court grant her motion and extend the deadline for answer and appendix to June 2, 2021. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1).

Dated this 23rd day of April 2021.

THE POWELL LAW FIRM

/s/ Tom W. Stewart  
Tom W. Stewart, Esq.  
Nevada Bar No. 14280

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER** with the Nevada Supreme Court on the 23rd day of April 2021. Electronic Service of the document shall be made in accordance with the Master Service List as follows:

Michael P. Lowry, Esq.  
Evan D. Schwab, Esq.  
John B. Shook, Esq.  
Judge Nancy Allf, Eighth Judicial District Court

/s/ Tom W. Stewart  
An Employee of The Powell Law Firm