

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**

(Second 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. The Court previously granted a 30-day extension of time for Felsner to file her answer, which is currently due June 2, 2021. If the Court grants this motion, the answer will be

due July 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. On May 17, 2021, Tom W. Stewart, Esq., the attorney principally handling the research and drafting of Heather's answer, welcomed his first child into the world, a happy, healthy baby girl. This wonderful development has placed sudden and unexpected demands on Mr. Stewart's schedule.

3. Although Mr. Stewart has worked diligently to complete the answer to the writ petition, additional time will be necessary to finalize the brief.

4. 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.

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

Dated this 28th day of May 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 28th day of May 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