

IN THE SUPREME COURT OF THE STATE OF NEVADA

THE LAS VEGAS REVIEW
JOURNAL,
Appellant,

vs.

CLARK COUNTY OFFICE OF THE
CORONER/MEDICAL EXAMINER,

Respondent.

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Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.: 82908

DISTRICT COURT CASE NO.:
A-17-758501-W

**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S
REPLY BRIEF [FIRST REQUEST]**

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**UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT'S
REPLY BRIEF [FIRST REQUEST]**

Appellant LAS VEGAS REVIEW-JOURNAL, by and through its counsel, Margaret A. McLetchie of McLetchie Law, hereby respectfully requests forty-five (45) days, until January 13, 2022, to file its Reply Brief, which is currently due on November 29, 2021. This is Appellant's first request for an extension in this matter. This motion is based on the following memorandum and all papers and pleadings on file herein. Jackie Nichols, counsel for Respondent, has indicated Respondent has no objection to this request.

DATED this the 8th day of November, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

MCLETCHIE LAW

602 South Tenth Street

Las Vegas, Nevada 89101

Counsel for Respondent, Las Vegas Review-Journal

MEMORANDUM

Appellant the Las Vegas Review-Journal (“Review-Journal”), by and through its undersigned counsel of record, hereby moves this Court pursuant to Nevada Rule of Appellate Procedure 31(b) for a forty-five (45) day extension of time to file its Reply Brief.

The Review-Journal’s Reply Brief was originally due November 29, 2021. If the Court grants this request, the Review-Journal’s Reply Brief will be due on January 13, 2022.

This Court may “[f]or good cause” extend the time “prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires.” NRAP 26(b)(1)(A). Here, there is “good cause” to extend the deadline from November 29, 2021, to January 13, 2022:

1. Undersigned counsel has been out of the jurisdiction and will not return until November 15, 2021.

2. In addition, the undersigned counsel has had competing deadlines in other matters, including *Lance Downes-Covington, et al. v. Las Vegas Metropolitan Police Department, et al.*, Dist. Court Case No. 2:20-cv-1773, in which counsel for Appellant here is representing seven plaintiffs in a complex civil rights suit pertaining to the protests which occurred in Las Vegas, Nevada between May and July 2020 in the wake of the murder of George Floyd in Minneapolis, Minnesota.

Given the number of claims and plaintiffs in the *Downes-Covington* matter, and the fact that the matter predates the instant matter, the Parties have had to dedicate substantial time and resources to discovery, including dozens of discovery requests and the scheduling of myriad depositions, currently scheduled throughout November and December 2021. On November 22, 2021, counsel for Appellant has a Response to Motion for Summary Judgment due in *Solomon v. Las Vegas Metropolitan Police Department*, Dist. Court Case No. 2:19-cv-00652. Counsel for Appellant has a Response to an Order to Show Cause due on December 6, 2021, in *Las Vegas Metropolitan Police Department v. Las Vegas review-Journal, Inc.*, Nevada Supreme Court Case No. 834930. Counsel for Appellant also has an Opening Brief due in *Miller v. Nye County*, Ninth Circuit Case No. 21-16826 due on December 28, 2021. Counsel for Appellant has a number of additional deadlines.

3. Moreover, with the holidays, there are a number of limitations on the schedule of the undersigned counsel as well as her client.

4. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of forty-five (45) days for the Reply Brief, which would move that deadline from November 29, 2021 to January 13, 2022.

5. On November 5, 2021, I contacted Jackie Nichols, counsel for Respondent regarding the need for this extension. On November 8, 2021, Ms.

Nichols indicated Respondent has no objection to this request. The undersigned appreciates opposing counsel's professional courtesy.

The undersigned declares under penalty of perjury the factual representations set forth in the foregoing memorandum are true and correct.

DATED this 8th day of November, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Nevada Bar No. 10931

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Counsel for The Las Vegas Review-Journal

CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION FOR EXTENSION TO FILE APPELLANT’S REPLY BRIEF [FIRST REQUEST] was filed electronically with the Nevada Supreme Court on the 8th day of November, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

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/s/ Pharan Burchfield
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