

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

DEFENDANT FREEMAN EXPOSITIONS,  
LLC;

Petitioner,

vs.

The EIGHTH JUDICIAL DISTRICT  
COURT of the State of Nevada, In and For the  
COUNTY OF CLARK, the Honorable  
TREVOR ATKIN, District Judge, Department  
VIII;

Respondent.

and

JAMES ROUSHKOLB

Real Party in Interest

Case No.: 83172

District Court Case No. A-19-80518-C

Electronically Filed  
Nov 12 2021 04:50 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**STIPULATION FOR EXTENSION OF TIME TO FILE AN ANSWER TO WRIT OF  
MANDAMUS (2ND REQUEST)**

Respondent James Roushkolb ("Real Party in Interest") and Petitioner Freeman Expositions LLC ("Petitioner"), by and through their respective counsel of record, hereby stipulate to a thirty-day extension for Real Party in Interest to Answer the Writ of Mandamus (currently due November 15, 2021) up to and including December 8, 2021. NRAP 26(b)(2).

Good cause readily exists for the requested extension. The requested extension ensures sufficient time is provided as the Real Party in Interest's counsel has been in trial in District Court and was therefore obligated to devote substantial resources in the weeks leading up to trial in such matter. Further, Real Party in Interest's counsel has experienced personnel changes additionally necessitating the requested extension. Also, Real Party in Interest's counsel's father recently experienced a serious medical episode that required extended hospital admission. Further, Real Party in Interest's counsel's father is also involved in numerous civil matters, was involved in a criminal matter at such time, and Real Party in Interest's counsel is assisting in

such endeavors. Finally, additional substantive review of caselaw is necessary given recent national developments regarding the important and novel issues presented in this matter. Accordingly, the parties hereby agree that Real Party in Interest's Answer to the Writ of Mandamus shall be due on or before December 8, 2021.

This is the second request for an extension of time to file an Answer to the Writ of Mandamus. This request is not sought for any improper purpose or other reason of delay.

Dated this \_\_\_ day of November 2021.

By: /s/ Christian Gabroy  
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Dated this \_\_\_ day of November 2021.

By: /s/ Paul R. Trimmer  
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