

IN THE SUPREME COURT OF THE STATE OF NEVADA

FREEMAN EXPOSITIONS, LLC,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE VERONICA
BARISICH, DISTRICT JUDGE,

Respondents,

and

JAMES ROUSHKOLB,

Real Party in Interest.

No. 83172

Electronically Filed
Dec 21 2021 06:08 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR LEAVE TO FILE AMICUS BRIEF OF THE
NEVADA JUSTICE ASSOCIATION
(First Request)**

The Nevada Justice Association (“NJA”), a proposed amicus curiae, is a non-profit organization of independent lawyers in the State of Nevada. NJA is represented in this matter by Micah S. Echols, Esq., Joseph N. Mott, Esq., and Scott E. Lundy, Esq., of Claggett & Sykes Law Firm, and hereby moves this Court pursuant to NRAP 26(1)(a) for an

extension of 30 days from the Court's Order to file its motion for leave to file an amicus brief and the proposed amicus brief.

Under this Court's rules, a non-governmental amicus curiae "may file a brief only be leave of court granted on motion or at the court's request or if accompanied by written consent of all parties." NRAP 29(a). Both the proposed amicus brief and the motion for leave must be filed within seven days of the brief of the party being supported. *See* NRAP 29(f). However, "[t]he court may grant leave for later filing, specifying the time within which the opposing party may answer." *Id.*

Here, Real Party in Interest, James Roushkolb, filed his answer to petition for writ on December 15, 2021. Thus, NJA's proposed amicus brief (accompanied by its motion for leave) would be due December 22, 2021. No request for additional time has been denied or denied in part.

Good cause exists to allow NJA to extend the filing deadline for both its motion for leave and the proposed amicus brief until 30 days after this Court's order for the following reasons:

1. NJA's participation in this matter had to be approved by a committee before counsel could make an appearance.
2. NJA first appeared in this matter on December 21, 2021, and

counsel will need time to familiarize themselves with the record, the legal arguments, and the briefing currently before the Court.

3. NJA believes it can assist this Court in providing an interpretation of NRS 613.333, as well as the associated public policy concerns, beyond what has been raised in the answer to writ petition.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1)(a). For the foregoing reasons, NJA respectfully moves this Court for an extension of time to file its proposed amicus brief (accompanied by its motion for leave) no later than 30 days after this Court's Order.

DATED this 21st day of December 2021.

CLAGGETT & SYKES LAW FIRM

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION (First Request)** with the Supreme Court of Nevada on the 21st day of December 2021. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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I further certify that I emailed the foregoing document to the following:

Hon. Veronica M. Barisich, D.J.
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Respondents

/s/ Anna Gresl

Anna Gresl, an employee of
CLAGGETT & SYKES LAW FIRM