

IN THE SUPREME COURT OF THE STATE OF NEVADA

ERRYS DEE DAVIS, A MINOR,
THROUGH HER PARENTS TRACI
PARKS AND ERRICK DAVIS;
THOMAS ZIEGLER; FREDERICK
BICKHAM; AND JANE NELSON,

Petitioners,

vs.

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

Respondents,

and

STEPHANIE A. JONES, D.O.; DANIEL
M. KIRGAN, M.D.; IRA MICHAEL
SCHNEIER, M.D.; MUHAMMAD
SAEED SABIR, M.D.; AND JAYSON
AGATON, APRN,

Real Parties in Interest.

No. 83306

Electronically Filed
Sep 01 2021 12:54 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 Jennifer Morales, Esq., Shirley Blazich, Esq., Shannon Wise, Esq., and Micah S. Echols, Esq. of Claggett & Sykes Law Firm, and hereby moves this Court pursuant to NRAP 26(1)(a) for an extension of time 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 by leave of court granted on motion or at the court's request or if accompanied by written consent of all parties." *See* 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, Petitioners, Errys Dee Davis, a minor, through her parents Traci Parks and Errick Davis; Thomas Ziegler; Frederick Bickham; and Jane Nelson, filed their petition for writ of mandamus, or, in the alternative, writ of prohibition on August 2, 2021. Thus, NJA proposed amicus brief (accompanied by its motion for leave) would have been due August 9, 2021. No request for additional time has been denied or denied

in part.

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

1. NJA entered its appearance in this matter on September 1, 2021 and will need time to familiarize itself with the record, the legal arguments, and the petition currently before the Court.

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 motion for leave to file an amicus brief and its proposed brief to no later than 30 days after this Court's order.

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Dated this 1st day of September 2021.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION (First Request)** was filed electronically with the Nevada Supreme Court on the 1st day of September 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Breeden & Associates, PLLC
Lauria Tokunaga Gates & Linn, LLP/Las Vegas
Hall Prangle & Schoonveld, LLC/Las Vegas
McBride Hall

/s/ Anna Gresl

Anna Gresl, an employee of
CLAGGETT & SYKES LAW FIRM