

IN THE SUPREME COURT OF THE STATE OF NEVADA

PRO PETROLEUM, LLC; RIP  
GRIFFIN TRUCK SERVICE  
CENTER, INC.; AND DAVID  
YAZZIE, JR.,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA, IN AND FOR THE  
COUNTY OF CLARK ; AND THE  
HONORABLE SUSAN H. JOHNSON,  
DISTRICT COURT JUDGE,

Respondents,

and

DAKOTA JAMES LARSEN,

Real Party in Interest.

No. 83536

Electronically Filed  
Nov 09 2021 03:16 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

*MOTION FOR EXTENSION OF TIME TO FILE  
REAL PARTY IN INTEREST'S ANSWER TO PETITION FOR WRIT OF  
MANDAMUS AND/OR PROHIBITION*

Real Party in Interest, Dakota James Larsen ("Larsen"), by and through his counsel of record, respectfully moves this Honorable Court, pursuant to NRAP 26, for an extension of 30 days in which to file his answer to petition for a writ of mandamus and/or prohibition.

Larsen's answer was originally due on November 12, 2021. This is his first motion for extension of time. No request for additional time has

been denied or denied in part. If this Court grants this request for an extension of 30 days, Larsen's answer will be due on Monday, December 13, 2021.

Good cause exists to grant the requested extension for the following reasons:

1. Larsen's lead appellate counsel, Micah S. Echols, Esq., and David P. Snyder, Esq., entered their appearance on November 3, 2021.

2. When Mr. Echols and Mr. Snyder entered their appearance, they were in the middle of post-verdict motion practice in Clark County Nevada, District Court in *Encarnacion Espana v. Republic Silver State Disposal, Inc.*, et al., Case No. A-18-782026-C.

3. Concurrently, Mr. Echols, spent the past week in all-day hearings arguing motions in Elko County, Nevada, District Court in *Diane Schwartz v. David Garvey, M.D.*, et al., Case No. CV-C-17-439.

4. Due to these lengthy matters, both Mr. Echols and Mr. Snyder have been unable to complete Larsen's answer to the writ petition.

5. The additional requested time of 30 days will allow lead appellate counsel to complete the answer and confer with co-counsel and the client on the positions taken in the final draft of Larsen's answer.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1)(A). For the foregoing reasons, Larsen respectfully requests a 30-day extension of time, until December 13, 2021, within which to file and serve his answer to the petition for a writ of mandamus and/or prohibition.

Dated this 9th day of November 2021.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols  
Micah S. Echols, Esq.  
Nevada Bar No. 8437  
David P. Snyder, Esq.  
Nevada Bar No. 15333  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
Telephone: (702) 655-2346  
Facsimile: (702) 655-3763  
[micah@claggettlaw.com](mailto:micah@claggettlaw.com)  
[david@claggettlaw.com](mailto:david@claggettlaw.com)

*Attorneys for Real Party in Interest,  
Dakota James Larsen*

*CERTIFICATE OF SERVICE*

I hereby certify that I electronically filed the foregoing *MOTION FOR EXTENSION OF TIME TO FILE REAL PARTY IN INTEREST'S ANSWER TO PETITION FOR WRIT OF MANDAMUS AND/OR PROHIBITION* with the Supreme Court of Nevada on the 9th day of November 2021. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

Annalisa N. Grant, Esq.

[annalisa.grant@aig.com](mailto:annalisa.grant@aig.com)

Sonya C. Watson, Esq.

[Sonya.watson@aig.com](mailto:Sonya.watson@aig.com)

GRANT & ASSOCIATES

7455 Arroyo Crossing Parkway, Suite 220, Las Vegas, Nevada 89113

*Attorneys for Petitioners, Pro Petroleum, LLC;*

*Rip Griffin Truck Service Center, Inc.; and David Yazzie, Jr.*

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

Hon. Susan H. Johnson, District Court Judge

[Dept22LC@clarkcountycourts.us](mailto:Dept22LC@clarkcountycourts.us)

/s/ Anna Gresl

Anna Gresl, an employee of  
CLAGGETT & SYKES LAW FIRM