

In the Supreme Court of Nevada

CLARK COUNTY SCHOOL DISTRICT,
Appellant,

vs.

MARY BRYAN, mother of ETHAN
BRYAN; and AIMEE HAIRR, mother
of NOLAN HAIRR,
Respondents.

Electronically Filed
Mar 04 2022 06:59 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OPENING BRIEF AND APPENDIX**

Appellant Clark County School District requests an extension through May 3, 2022, to file its opening brief and appendix. NRAP 31(b)(3). This is the first such motion following the parties' stipulation. Without an extension, the brief would be due March 4, 2022. No requests for extension have been denied or denied in part.

Respondents' counsel does not oppose this request. His professional courtesy is greatly appreciated.

Good cause justifies the extension. Although counsel have substantially completed a draft of the brief, additional time is necessary. Two of the attorneys, lead appellate counsel and the attorney primarily responsible for drafting the brief, are out of state. A third attorney has

been unable to assist because of the press of a trial, which following the expiration of certain COVID restriction was expedited to begin next week. And while a fourth attorney has been enlisted to assist with the draft, he has been delayed by family and other obligations (following a long struggle, a beloved family pet died) and was unable to complete review of the draft.

While counsel aim to complete their revisions of the brief diligently, they learned just yesterday that this Court scheduled back-to-back oral arguments in two other appeals, Docket Nos. 81344 and 82467/82552 (consolidated). Preparation for those arguments—on top of the ordinary press of preparing for other trials, appellate briefs, and post-judgment motions in other cases—will unfortunately take time from the preparation of this brief. Appellants therefore request a reasonable time to complete the brief following those oral arguments.

Dated this 4th day of March, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Abraham G. Smith
DANIEL F. POLSENBERG (SBN 2376)
DAN R. WAITE (SBN 4078)
BRIAN D. BLAKLEY (SBN 13074)
ABRAHAM G. SMITH (SBN 13250)
3993 Howard Hughes Parkway,

Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I submitted the foregoing “Unopposed Motion for Extension of Time to File Opening Brief and Appendix” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

ALLEN LICHTENSTEIN
ALLEN LICHTENSTEIN ATTORNEY AT LAW, LTD.
3315 Russell Road, No. 222
Las Vegas, Nevada 89120

Attorneys for Respondent

/s/ Cynthia Kelley
An Employee of Lewis Roca Rothgerber Christie LLP