

IN THE SUPREME COURT OF THE STATE OF NEVADA

IRVING TORREMORO; AND
KEOLIS TRANSIT SERVICES, LLC,

Petitioners,

vs.
THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE ERIKA D. BALLOU,
DISTRICT JUDGE,

Respondents.

and

LAMONT COMPTON,

Real Party in Interest.

Supreme Court Case No. 83596
District Court Case No. A777370
Electronically Filed
Dec 06 2021 03:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**REAL PARTY IN INTEREST, LAMONT COMPTON'S, MOTION TO
EXTEND THE DEADLINE TO FILE ANSWER IN REGARDS TO
ISSUANCE OF THE REQUESTED WRIT (FIRST REQUEST)**

Real Party in Interest, Lamont Compton ("Real Party in Interest"), by and through his attorneys of record, hereby respectfully files this motion pursuant to NRAP 26(b)(1) and NRAP 31(b)(3) to extend the deadline for Real Party in Interest to file his answer against issuance of the requested writ by thirty (30) days.

MEMORANDUM OF POINTS AND AUTHORITIES

On November 15, 2021, this Court issued an order directing real party in interest, on behalf of respondents, to file and serve an answer in regards to the

issuance of the requested writ by Petitioner. Real Party in Interest's answer is currently due within 28 days of that Order (December 13, 2021). No other extensions have been requested, granted or denied by this Court.

This motion is being sought pursuant to NRAP 31(b)(3) and NRAP 26(b)(1)(A), which states that for "good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires."

In light of the current holiday season and preparation for at least two trials set to go forward in the Eighth Judicial District Court, which has placed a temporary strain on Real Party in Interest's counsel's firm, Real Party in Interest is currently requesting an additional thirty (30) days to file the real party in interest's answer to the pending writ. Therefore, good cause exists to extend the deadline for real party in interest to file his answering brief by 30 days. This motion is not being sought for purposes of any delay. Further, real party in interest's counsel has conferred with petitioner's counsel for a stipulation for the extension, however, petitioner's counsel would only agree to an extension up until December 31, 2021.

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CONCLUSION

Real Party in Interest respectfully requests that the deadline to file his answer be extended from December 13, 2021 to January 12, 2021.

Respectfully submitted this 6th day of December 2021.

MAIER GUTIERREZ & ASSOCIATES

/s/ Stephen G. Clough

JOSEPH A. GUTIERREZ, ESQ.

Nevada Bar No. 9046

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*Attorneys for Plaintiff Lamont
Compton*

CERTIFICATE OF SERVICE

I certify that on the 6th day of December 2021, this document was electronically filed with the Nevada Supreme Court. Electronic service of the foregoing: **REAL PARTY IN INTEREST, LAMONT COMPTON’S, MOTION TO EXTEND THE DEADLINE TO FILE ANSWER IN REGARDS TO ISSUANCE OF THE REQUESTED WRIT (FIRST REQUEST)** shall be made in accordance with the Master Service List as follows:

Michael P. Lowry, Esq.
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Attorneys for Defendants Irving Torremoro and Keolis Transit Services, LLC

/s/ Brandon Lopipero

An Employee of MAIER GUTIERREZ &
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