1	WILSONELSER		
2	MICHAEL P. LOWRY, ESQ. Nevada Bar No. 10666		
3	E-mail: Michael.Lowry@wilsonelser.com 6689 Las Vegas Blvd. South, Suite 200	Electronically File Dec 10 2021 04:0	
4	Las Vegas, NV 89119 Tel: 702.727.1400/Fax: 702.727.1401	Elizabeth A. Brow Clerk of Supreme	'n
5	Attorneys for Irving Torremoro; Keolis T	ransit Services, LLC	
6	IN THE SUPREME COURT (OF THE STATE OF NEVADA	
	IN THE SOI REIVE COOK!	or the state of the value	
7		Supreme Ct. No.: 83596	
8		Dist. Ct. Case No.: A-18-777320-C	
9	Petitioner, vs.	Petitioners' Limited Opposition to	
10	The Eighth Judicial District Court and	Motion to Extend	
11	the Honorable Erika Ballou, Judge,		
12	Respondents		
13	and		
14	Lamont Compton,		
15	Real Party in Interest		
16			
17			
18			
19			

20

Memorandum of Points & Authorities

I. Compton should get the extension Rule 26(b)(1) permits.

Petitioners offer a limited opposition to this motion. Compton's answering brief is presently due December 13. Rule 26(b)(1)(B) permits Compton to "request by telephone a single 14-day extension of time for performing any act except the filing of a notice of appeal." In practice this extension is routinely granted. Petitioners do not oppose granting Compton the 14 day extension Rule 26(b)(1)(B) provides.

Petitioners oppose a further extension. The petition was filed on October 8 and raises narrow issues that Compton previously briefed to the district court. On November 15 the order directing an answer was filed. Although Compton asserts his counsel are preparing for two trials, so is Petitioners' lawyer. Further, in the context of docketing statements "[c]ounsel's caseload generally will not provide grounds for an extension." This logic should apply in other contexts too.

15 | | ///

17 || ///

19 | | ///

| D.-1a 14(d)

¹ Rule 14(d).

DATED this 10th day of December, 2021.



BY: /s/ Michael P. Lowry

MICHAEL P. LOWRY Nevada Bar No. 10666 6689 Las Vegas Blvd. South, Suite 200 Las Vegas, NV 89119 Attorneys for Irving Torremoro; Keolis Transit Services, LLC

Certificate of Service

Per Rule 25(c), I certify that I am an employee of Wilson Elser Moskowitz

Edelman & Dicker LLP, and that on December 10, 2021, Petitioners' Limited

Opposition to Motion to Extend was served via electronic means by operation of

the Court's electronic filing system to:

Stephen G. Clough, Esq.	Judge Erika Ballou
Maier Gutierrez & Associates	Eighth Judicial District Court
8816 Spanish Ridge Avenue	Department 24
Las Vegas, Nevada 89148	200 Lewis Ave.
Attorneys for Lamont Compton	Las Vegas, Nevada 89155

BY: /s/ Amanda Hill

An Employee of



19

17

18

20