

IN THE SUPREME COURT OF THE STATE OF NEVADA

Supreme Court No. \_\_\_\_\_  
District Court Case No. A-18-772761-C

Electronically Filed  
Oct 11 2021 11:04 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

VENETIAN CASINO RESORT, LLC, a Nevada limited liability company,  
LAS VEGAS SANDS, LLC, a Nevada limited liability company,  
Petitioners,

v.

EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN  
AND FOR THE COUNTY OF CLARK, AND THE HONORABLE KATHLEEN  
DELANEY in her capacity as District Judge,  
Respondent,  
JOYCE SEKERA, an individual,  
Real Party in Interest

**VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC'S**  
**NRAP RULE 32(a)(7)(D) MOTION TO EXCEED TYPE VOLUME**  
**LIMITATION**

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Petitioners VENETIAN CASINO RESORT, LLC, and LAS VEGAS SANDS, LLC (“Petitioners”), by and through the law firm of Royal & Miles LLP, hereby submits the following Motion for Extending Briefing. This Motion is based upon and supported by the following memorandum of points and authorities, the pleadings and papers on file, the exhibits attached hereto, and any argument that the Court may allow at the time of the hearing.

DATED this 8 day of October 2021.

ROYAL & MILES LLP

By: 

Michael A. Royal, Esq. (SBN 4370)  
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1522 W. Warm Springs Rd.  
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Counsel for Petitioners

**MEMORANDUM AND POINTS AND AUTHORITIES**

Petitioners are presenting their third writ for petition of mandamus and/or writ of prohibition on the same critical issue related to protecting the privacy interests of guests of the Venetian Resort Hotel Casino having no connection to the November 4, 2016 incident involving Real Party In Interest, Joyce Sekera (“Sekera”). There is a substantial procedural history related to this matter, which includes the prior two writ proceedings, an order from the Nevada Court of Appeals remanding the issue of NRCP 26(c) protection to the District Court to be

considered in the manner instruction pursuant to as *Venetian Casino Resort, LLC v. Eighth Judicial Dist. Court*, 467 P.3d 1, 136 Nev. Adv. Op. 26 (May 14, 2020).

In an effort to provide the appellate court with a complete procedural history and record of the case, which is deemed critical to the privacy issues at issue, and to further present a detailed review of the subsequent District Court proceeding addressing this matter, Petitioners require additional briefing beyond the limitation presented in NRAP 21(d). The Petition is being filed concurrently hereto.

### **CONCLUSION**

Based on the foregoing, Petitioners respectfully request that this Honorable Court grant this Motion for Extended Briefing related to their Petition for Writ of Mandamus and/or Writ of Prohibition.

DATED this 8 day of October 2021.

ROYAL & MILES LLP

By: 

Michael A. Royal, Esq. (SBN 4370)

Gregory A. Miles, Esq. (SBN 4336)

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Henderson, NV 89014

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Counsel for Petitioners

**NRAP, RULES 32(a)(9) & 32(a)(7)(D)(ii) CERTIFICATE OF  
COMPLIANCE AS TO WRIT PETITION**

STATE OF NEVADA     )  
COUNTY OF CLARK    } ss:

I, Michael A. Royal, hereby affirm, testify, and declare under penalty of perjury as follows:

1. I am an attorney licensed to practice in the State of Nevada and am a member of the law firm of Royal & Miles LLP, attorneys for Petitioners VENETIAN CASINO RESORT, LLC, and LAS VEGAS SANDS, LLC.

2. I hereby certify that the Writ Petition referenced in this motion pursuant to NRAP 32(a)(7)(D)(iii) complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type-style requirements of NRAP 32(a)(6) because:

[X] The Writ Petition has been prepared in a proportionally spaced typeface using Microsoft Word in Times Roman 14-point font.

3. I further certify that the Writ Petition referenced in this motion pursuant to NRAP 32(a)(7)(D)(iii) is proportionately spaced, has a typeface of 14 points or more, and contains **10,891 words** in compliance with NRAP 32(a)(7)(A)(ii), excluding the parts of the Writ Petition exempted by NRAP 32(a)(7)(C).

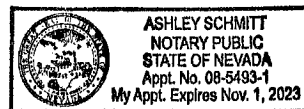
4. Finally, I hereby certify that I have read the Writ, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions if the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

Further affiant sayeth naught.

  
MICHAEL A. ROYAL, ESQ.

SUBSCRIBED AND SWORN to before  
me by Michael A. Royal, Esq., on this  
6 day of October 2021.

  
NOTARY PUBLIC in and for said  
County and State



**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the law firm of Royal & Miles LLP, attorneys for Petitioners, VENETIAN CASINO RESORT, LLC and LAS VEGAS SANDS, LLC, and that on the 8 day of October, 2021, I served true and correct copy of the foregoing VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC'S NRAP RULE 32(a)(7)(D) MOTION TO EXCEED TYPE VOLUME LIMITATION, by delivering the same via U.S. Mail addressed to the following:

Keith E. Galliher, Jr., Esq.  
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*and*

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*Attorneys for Real Party in Interest*

Honorable Kathleen Delaney  
Eighth Jud. District Court, Dept. 25  
200 Lewis Avenue  
Las Vegas, NV 89155  
*Respondent*

  
\_\_\_\_\_  
An employee of Royal & Miles LLP