

**IN THE COURT OF APPEALS OF THE STATE OF NEVADA**

VENETIAN CASINO RESORT, LLC;  
AND LAS VEGAS SANDS, LLC,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF  
NEVADA, IN AND FOR THE  
COUNTY OF CLARK; AND THE  
HONORABLE KATHLEEN E.  
DELANEY, DISTRICT JUDGE,

Respondents,

and

JOYCE SEKERA, AN INDIVIDUAL,

Real Party in Interest.

No. 83600-COA

Electronically Filed  
Nov 09 2021 11:36 a.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, Joyce Sekera ("Sekera"), by and through her counsel of record, respectfully moves this Honorable Court, pursuant to NRAP 26, for an extension of 30 days in which to file her answer to petition for a writ of mandamus and/or prohibition.

Sekera's answer was originally due on November 9, 2021. This is her 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, Sekera's answer will be due on Thursday, December 9, 2021.

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

1. Sekera's lead appellate counsel, Micah S. Echols, Esq., and David P. Snyder, Esq., entered their appearance on October 20, 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.*, 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 Sekera'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 Sekera's answer to petition for a writ of mandamus and/or prohibition.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1)(A). For the foregoing reasons, Sekera respectfully requests a 30-day extension of time, until December 9, 2021, within which to file and serve her 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  
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*Attorneys for Real Party in Interest,  
Joyce Sekera*

*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 Nevada Court of Appeals on the 9th day of November 2021. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

Michael A. Royal, Esq.  
Gregory A. Miles, Esq.

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

Hon. Kathleen E. Delaney, District Court Judge  
[Dept25LC@clarkcountycourts.us](mailto:Dept25LC@clarkcountycourts.us)

/s/ Anna Gresl  
\_\_\_\_\_  
Anna Gresl, an employee of  
CLAGGETT & SYKES LAW FIRM