

IN THE SUPREME COURT OF THE STATE OF NEVADA  
OFFICE OF THE CLERK

Electronically Filed  
Jan 11 2022 01:56 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

JOHN ILIESCU, JR.;  
SONNIA ILIESCU, TRUSTEES OF  
THE JOHN ILIESCU JR. AND  
SONNIA ILIESCU 1992 FAMILY  
TRUST AGREEMENT, DATED  
JANUARY 24, 1992,

Appellants,

vs.

THE REGIONAL  
TRANSPORTATION  
COMMISSION OF WASHOE  
COUNTY, A SPECIAL PURPOSE  
UNIT OF THE GOVERNMENT,

Respondent.

Supreme Court Nos. 83212, 83756  
(consolidated)

District Court Case No. CV1900753

**MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF**

Respondent, The Regional Transportation Commission of Washoe County (“RTC”), through its counsel, Woodburn and Wedge, moves this Court pursuant to NRAP 26(b) and NRAP 31(b)(3) for an order extending the time within which RTC must file its answering brief.

RTC's answering brief is currently due on January 31, 2022. RTC requests an additional thirty (30) days beyond that date within which to file its answering brief, up to and including March 2, 2022. This is the first request for an extension of time to file RTC's answering brief. As no prior requests have been made, none have been denied. RTC requests this extension of time because the schedule of RTC's counsel is such that additional time is necessary to allow for proper preparation of the answering brief. This includes multiple depositions at the end of January and early February, as well as another brief due currently due in this Court at or about the same time.

For the foregoing reasons, RTC respectfully requests that the Court grant an additional 30 days, up to and including **March 2, 2022**, within which RTC may file and serve its answering brief.

RTC's counsel has conferred with Appellants' counsel, and Appellants' counsel does not oppose RTC's request for additional time to file the answering brief. See Exhibit 1, attached.

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The undersigned does hereby affirm, pursuant to NRS 239B.030, that the preceding document does not contain the personal information of any person.

Dated this 11<sup>th</sup> day of January, 2022.

WOODBURN AND WEDGE

By: /s/ Dane W. Anderson  
Dane W. Anderson, Esq.  
Nevada Bar No. 6883

*Attorneys for Respondent,  
RTC*

## **CERTIFICATE OF SERVICE**

I am an employee of the law offices of Woodburn and Wedge, 6100 Neil Road, Suite 500, Reno, Nevada 89511, and that on this date, I caused to be sent via electronic service through the Court's e-filing system, a true and correct copy of the **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** to:

D. Chris Albright  
801 So. Rancho Dr. Suite D-4  
Las Vegas, NV 89106  
[calbright@albrightstoddard.com](mailto:calbright@albrightstoddard.com)

Dated: January 11, 2022.

/s/ Caitlin Pagni  
An employee of Woodburn and Wedge

# EXHIBIT 1

# EXHIBIT 1

**From:** [Chris Albright](#)  
**To:** [Dane Anderson](#)  
**Cc:** [Cheritta Grey](#)  
**Subject:** RE: Iliescu v. RTC appeal  
**Date:** Tuesday, January 11, 2022 12:59:26 PM

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Sure no problem.

**Cheritta**, can you put together a response indicating that we have no objection to the relief requested in Mr. Anderson's motion to extend for my review? Thanks.

D. Chris Albright



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[www.albrightstoddard.com](http://www.albrightstoddard.com)

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**From:** Dane Anderson [mailto:DAnderson@woodburnandwedge.com]  
**Sent:** Tuesday, January 11, 2022 11:40 AM  
**To:** Chris Albright <calbright@albrightstoddard.com>  
**Subject:** Iliescu v. RTC appeal

Hi Chris,

Happy new year. I am going to need additional time to file RTC's answering brief. I've prepared a short motion making this request. If you have no objection, would you please reply to that effect so I can include that in the motion?

Thank you,

**Dane W. Anderson**

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775.688.3000  
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