

IN THE SUPREME COURT OF NEVADA

LAS VEGAS POLICE PROTECTIVE
ASSOCIATION, INC.

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT,
IN AND FOR THE COUNTY OF CLARK,
STATE OF NEVADA, DEPARTMENT
XXVII, THE HONORABLE NANCY L.
ALLF,

Respondent,

And

JORDAN TRAVERS and LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,

Real Parties in Interest.

Electronically Filed
Case No. 83793 Feb 02 2022 05:23 p.m.
Elizabeth A. Brown
District Court Clerk of Supreme Court
A-21-832601-P

**MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEF**

COMES NOW, Petitioner, LAS VEGAS POLICE PROTECTIVE ASSOCIATION, INC., by and through its counsel of record, ANTHONY P. SGRO, ESQ. , JENNIFER WILLIS ARLEDGE, ESQ., and DAVID J. J. ROGER, ESQ., of the law firm SGRO & ROGER, and hereby moves this Honorable Court for an extension of time, pursuant to NRAP 31(b)(3)(A), to file Petitioner's Reply Brief to the Answering Briefs filed by Real Parties in Interest, JORDAN TRAVERS and LAS VEGAS METROPOLITAN POLICE DEPARTMENT, which were filed in this matter on January 12, 2022, and January 18, 2022, respectively.

LEGAL STANDARD

Nevada Rule of Appellate Procedure 31(b)(3)(A) states:

“Motions for Extensions of Time. A motion for extension of time for filing a brief may be made no later than the due date for the brief and must comply with the provisions of this Rule and Rule 27.

(A) Contents of Motion. A motion for extension of time for filing a brief shall include the following:

- (i) The date when the brief is due;
- (ii) The number of extensions of time previously granted (including a 14-day telephonic extension), and if extensions were granted, the original date when the brief was due;
- (iii) Whether any previous requests for extensions of time have been denied or denied in part;
- (iv) The reasons or grounds why an extension is necessary (including demonstrating extraordinary and compelling circumstances under Rule 26(b)(1)(B), if required); and
- (v) The length of the extension requested and the date on which the brief would become due.”

LEGAL ARGUMENT

Petitioner’s Reply Brief was due in this matter on February 1, 2022. However, due to a clerical error, Petitioner’s counsel mis-calendared the due date for the Reply Brief to be on February 3, 2022.

On December 23, 2021, this Court filed and served an Order directing the Real Parties in Interest to file Answers to Petitioner’s Petition for Writ of Mandamus or Writ of Prohibition within twenty-eight (28) days of service of the Order. Accordingly, the Real Parties in Interest had until January 20, 2022 to file Answers to the Petition for Writ of Mandamus or Writ of Prohibition.

In that same Order, this Court directed Petitioner to file its Reply Brief within fourteen (14) days from service of the Answering Briefs. Real Party in Interest Jordan Travers filed and served his Answering Brief on January 12, 2022 and Real Party in Interest Las Vegas Metropolitan Police Department filed its Answering Brief on January 18, 2022. Accordingly, both Real Parties in Interest filed their respective Answering Briefs before the January 20, 2022 deadline. Upon information and belief, counsel for Petitioner made the clerical error of calendaring the due date for the Reply Brief to be fourteen (14) days from the *deadline* for the Real Parties in Interest to file Answering Briefs, rather than fourteen (14) days from the date the Answering Briefs were actually filed. Accordingly, Petitioner inadvertently missed the deadline to file its Reply Brief.

The instant Motion constitutes Petitioners first request for an extension of time to file its Reply Brief. Accordingly, no previous requests for an extension have been granted or denied. Petitioner asserts that good cause exist for the extension because Petitioner's failure to file a Reply brief within the period it was ordered to do so was inadvertent and the result of a clerical mistake committed by counsel for the Petitioner.

Petitioner is respectfully requesting a two (2) week extension to file its Reply Brief. If this request is granted, the new date to file the Reply Brief would be February 15, 2022.

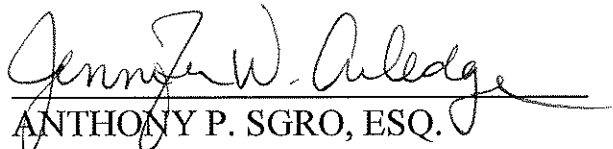
CONCLUSION

WHEREFORE, Petitioner respectfully requests that this Court enter an Order Granting Petitioner's Motion for Extension of Time to File Reply Brief, and Order that Petitioner's Reply Brief must be filed and served in this matter on or before February 15, 2022.

Dated this 2nd day of February, 2022.

Respectfully submitted,

SGRO & ROGER



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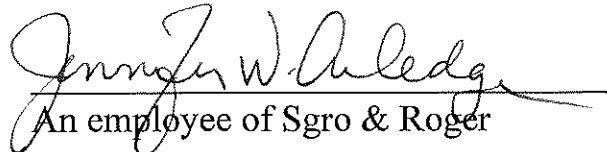
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CERTIFICATE OF SERVICE BY ELECTRONICS MEANS

I hereby certify that I am an employee of the law firm of SGRO & ROGER and that on the 2nd day of February, 2022, I did serve the above and foregoing MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF, by way of Notice of Electronic Filing provided by the court mandated E-Flex filing service, upon the following parties:

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