

IN THE SUPREME COURT OF THE STATE OF NEVADA

Case No. 84345

and

Case No. 84640

Electronically Filed
Aug 05 2022 05:25 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CITY OF LAS VEGAS, a political subdivision of the State of Nevada,

Appellant

v.

180 LAND CO, LLC, a Nevada limited-liability company, FORE STARS LTD.,
a Nevada limited liability company,

Respondents

District Court Case No.: A-17-758528-J
Eighth Judicial District Court of Nevada

**APPELLANT CITY OF LAS VEGAS'
MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF AND JOINT APPENDIX**

<p>LAS VEGAS CITY ATTORNEY'S OFFICE Bryan K. Scott (#4381) Philip R. Byrnes (#166) Rebecca Wolfson (#14132) 495 S. Main Street, 6th Floor Las Vegas, NV 89101 Phone: 702.229.6629 Fax: 702.386.1749 bscott@lasvegasnevada.gov pbyrnes@lasvegasnevada.gov rwolfson@lasvegasnevada.gov</p>	<p>McDONALD CARANO LLP George F. Ogilvie III (#3552) Amanda C. Yen (#9726) Christopher Molina (#14092) 2300 W. Sahara Ave, Suite 1200 Las Vegas, NV 89102 Phone: 702.873.4100 Fax: 702.873.9966 gogilvie@mcdonaldcarano.com ayen@mcdonaldcarano.com cmolina@mcdonaldcarano.com</p>
--	--

<p>LEONARD LAW, PC Debbie Leonard (#8260) 955 S. Virginia St., Suite #220 Reno, NV 89502 775-964-4656 debbie@leonardlawpc.com</p>	<p>SHUTE, MIHALY & WEINBERGER, LLP Andrew W. Schwartz (CA Bar No. 87699) (Admitted pro hac vice) Lauren M. Tarpey (CA Bar No. 321775) (Admitted pro hac vice) 396 Hayes Street San Francisco, California 94102</p>
---	---

Attorneys for Appellant City of Las Vegas

Pursuant to NRAP 26(b)(1) and NRAP 27(a)(1), Appellant CITY OF LAS VEGAS respectfully moves the Court for a 30-day extension of time to file its Opening Brief and the Joint Appendix from August 16, 2022 to September 15, 2022.

On June 20, 2022, the Court consolidated Case Nos. 84345 and 84640 and set a deadline of August 16, 2022 for the parties to file opening briefs. In its Docketing Statement for Case No. 84345, the City identified 24 distinct issues for appeal, which require a significant amount of time to analyze and present to the Court. The factual background for this case is extensive, which will require detailed citations to the appendix.

The parties have been coordinating on the contents of the joint appendix, and currently, due to the voluminous record, there are 132 volumes. Counsel for the City recently identified additional documents that need to be included in the joint appendix and is in the process of compiling them for inclusion. Because the joint appendix is not yet complete, notwithstanding the parties' diligent efforts, the City requests additional time for both the Opening Brief and the joint appendix to be filed.

In addition, on July 29, 2022, Respondents 180 Land, LLC and Fore Stars Ltd. ("the Developer") moved to dismiss the City's cross appeal in Case No. 84640. The Court has extended the City's deadline to respond to that motion to August 19, 2022. The parties are engaging in discussions regarding a possible resolution to that motion that will affect how the issues are briefed. If the parties cannot reach an agreement,

a decision on the motion to dismiss the City's cross appeal in Case No. 84640 will likely affect how the issues are briefed in Case No. 84345. As a result, an extension of time to commence briefing until that motion is decided will make the best use of the parties' and the Court's resources.

Counsel for the City is diligently working to draft the opening brief. Based on the foregoing, however, the City submits that good cause exists for the requested extension. This motion is brought in good faith and not for the purpose of delay.

DATED: August 5, 2022

By: /s/ Debbie Leonard

<p>LAS VEGAS CITY ATTORNEY'S OFFICE Bryan K. Scott (#4381) Philip R. Byrnes (#166) Rebecca Wolfson (#14132) 495 S. Main Street, 6th Floor Las Vegas, NV 89101 Phone: 702.229.6629 Fax: 702.386.1749 bscott@lasvegasnevada.gov pbyrnes@lasvegasnevada.gov rwolfson@lasvegasnevada.gov</p>	<p>McDONALD CARANO LLP George F. Ogilvie III (#3552) Amanda C. Yen (#9726) Christopher Molina (#14092) 2300 W. Sahara Ave, Suite 1200 Las Vegas, NV 89102 Phone: 702.873.4100 Fax: 702.873.9966 gogilvie@mcdonaldcarano.com ayen@mcdonaldcarano.com cmolina@mcdonaldcarano.com</p>
<p>LEONARD LAW, PC Debbie Leonard (#8260) 955 S. Virginia St., Suite #220 Reno, NV 89502 775-964-4656 debbie@leonardlawpc.com</p>	<p>SHUTE, MIHALY & WEINBERGER, LLP Andrew W. Schwartz (CA Bar No. 87699) (Admitted pro hac vice) Lauren M. Tarpey (CA Bar No. 321775) (Admitted pro hac vice) 396 Hayes Street San Francisco, California 94102</p>

Attorneys for Appellant City of Las Vegas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Leonard Law, PC, and that on this date a copy of the foregoing document was electronically filed with the Clerk of the Court for the Nevada Supreme Court on today's date by using the Nevada Supreme Court's E-Filing system (E-Flex). Participants in the case who are registered with E-Flex as users will be served by the E-Flex system. All others will be served by U.S. mail.

Dated: August 5, 2022

/s/ Tricia Trevino

Tricia Trevino