

IN THE SUPREME COURT OF THE STATE OF NEVADA

CITY OF LAS VEGAS, A POLITICAL
SUBDIVISION OF THE STATE OF
NEVADA,

Appellant,

vs.

180 LAND CO., LLC, A NEVADA LIMITED-
LIABILITY COMPANY; AND FORE STARS,
LTD., A NEVADA LIMITED-LIABILITY
COMPANY,

Respondents.

No. 84345

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Clerk of Supreme Court

180 LAND CO., LLC, A NEVADA LIMITED-
LIABILITY COMPANY; AND FORE STARS,
LTD., A NEVADA LIMITED-LIABILITY
COMPANY,

Appellants/Cross-Respondents,

vs.

CITY OF LAS VEGAS, A POLITICAL
SUBDIVISION OF THE STATE OF
NEVADA,

Respondent/Cross-Appellant.

No. 84640

**LANDOWNERS'
MOTION TO EXCEED PAGE
LIMIT FOR OPPOSITION TO
CITY OF LAS VEGAS'
MOTION TO STRIKE
LANDOWNERS' APPENDIX
AND ANSWERING BRIEF
AND
LANDOWNERS' REQUEST FOR
JUDICIAL NOTICE**

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**LANDOWNERS' MOTION TO EXCEED PAGE LIMIT FOR
OPPOSITION TO CITY OF LAS VEGAS' MOTION TO STRIKE
LANDOWNERS' APPENDIX AND ANSWERING BRIEF**

Landowners respectfully move this Court, under NRAP 27(d)(2) to exceed the page limit for its opposition to City of Las Vegas' motion to strike Landowners' appendix and answering brief by one page.

NRAP 27(d)(2) limits a response to a motion to 10 pages, unless the Court permits or directs otherwise.

Good cause exists to allow Landowners' opposition to exceed the page limit by one page for the reasons set forth in the following declaration of counsel for Landowners.

**DECLARATION OF MICAH S. ECHOLS, ESQ., IN SUPPORT OF
LANDOWNERS' OPPOSITION TO CITY OF LAS VEGAS'
MOTION TO STRIKE LANDOWNERS' APPENDIX AND
ANSWERING BRIEF**

Micah S. Echols, Esq., declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an attorney with Claggett & Sykes Law Firm, and one of the appellate attorneys for Landowners.

3. On February 1, 2023, the City filed a motion to strike Landowners' appendix and portions of the answering brief that cite to Landowners' appendix.

4. Although I have worked diligently to argue the issues brought by the City's motion as concisely and cogently as possible, the one additional page is needed to present the relevant arguments.

5. Based upon good cause, Landowners request that this Court extend the page limit of its opposition to the City's motion to strike Landowners' appendix and answering brief and allow it to be filed.

I declare under penalty and perjury that the foregoing is true and correct.

Dated this 14th day of February 2023.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **LANDOWNERS' MOTION TO EXCEED PAGE LIMIT FOR OPPOSITION TO CITY OF LAS VEGAS' MOTION TO STRIKE LANDOWNERS' APPENDIX AND ANSWERING BRIEF AND LANDOWNERS' REQUEST FOR JUDICIAL NOTICE** with the Supreme Court of Nevada on the 14th day of February 2023. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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