

IN THE SUPREME COURT OF THE STATE OF NEVADA

Case No. 84345

and

Case No. 84640

Electronically Filed
Feb 28 2023 10:29 AM
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

**CITY OF LAS VEGAS' MOTION TO EXCEED PAGE LIMIT FOR
REPLY IN SUPPORT OF MOTION TO STRIKE
"LANDOWNERS' APPENDIX" AND ANSWERING BRIEF**

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Attorneys for City of Las Vegas

POINTS AND AUTHORITIES

The City of Las Vegas respectfully moves the Court to exceed the 5-page limit imposed by NRAP 27(d)(2) to file its Reply in Support of Motion to Strike “Landowners’ Appendix” and Answering Brief (the “Reply”) filed concurrently herewith. NRAP 27(d)(2) states that a reply shall not exceed 5 pages unless the Court permits or directs otherwise.

Good cause exists to allow the City to file a Reply that is three and a half pages over the limit in order to fully respond to the Developer’s Opposition. The Developer filed an 11-page opposition and an Errata, which included citations to multiple cases, made multiple arguments, and referenced an unpublished order of the Court. To fully analyze and distinguish each case, respond to each argument, and address the unpublished order referenced by the Developer, the City exceeded the 5-page limit. The City’s undersigned counsel worked diligently to present its Reply as concisely and cogently as possible and takes seriously the page limits imposed in the Rules; however, notwithstanding these efforts, three and a half extra pages are needed.

The City posits that good cause exists to extend the 5-page limit and respectfully asks the Court to grant this motion.

AFFIRMATION

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 28th day of February, 2023

BY: /s/ Debbie Leonard

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Attorneys 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.

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Dated: February 28, 2023

/s/ Tricia Trevino

Tricia Trevino

**DECLARATION OF DEBBIE LEONARD IN SUPPORT OF
MOTION TO EXCEED PAGE LIMIT**

I, Debbie Leonard, do hereby swear under penalty of perjury that the assertions in this declaration are true and correct.

1. I am over the age of eighteen (18) years. I have personal knowledge of the facts stated within this declaration. If called as a witness, I would be competent to testify to these facts.

2. I am the owner of Leonard Law, PC and counsel of record for Appellant in this case, the City of Las Vegas.

3. This declaration is offered in support of Appellant's Motion to Exceed Page Limit For Reply in Support of Motion to Strike "Landowners' Appendix" and Answering Brief ("Reply").

4. The City respectfully moves the Court to exceed the 5-page limit imposed by NRAP 27(d)(2) to file its Reply filed concurrently herewith.

5. Good cause exists to allow the City to file a Reply that is three and a half pages over the limit in order to fully respond to the Developer's Opposition.

6. The Developer filed an 11-page opposition and an Errata, which included citations to multiple cases, made multiple arguments, and referenced an unpublished order of the Court. To fully analyze and distinguish each case, respond to each argument, and address the unpublished order referenced by the Developer, the City needed to exceed the 5-page limit.

7. I worked diligently to present the City's Reply as concisely and cogently as possible and take seriously the page limits imposed in the Rules; however, notwithstanding these efforts, three and a half extra pages are needed.

8. I respectfully submit that I exercised diligence and believe good cause exists to grant the Motion to exceed the 5-page limit in NRAP 27(d)(2) and request leave to do so.

9. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED February 28, 2023

/s/ Debbie Leonard
Debbie Leonard