

IN THE SUPREME COURT OF THE STATE OF NEVADA

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MINH NGUYET LUONG,

S.C. No.:

Appellant,

D.C. Case No.:

Electronically Filed
Apr 08 2022 09:22 a.m.
D-18-581474-D
Elizabeth A. Brown
Clerk of Supreme Court

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA, IN
AND FOR THE COUNTY OF CLARK, AND
THE HONORABLE DAWN THRONE,
DISTRICT COURT JUDGE,

and

JAMES W. VAHEY,

Real Party in Interest.

PETITIONER'S MOTION TO FILE

“EMERGENCY PETITION FOR WRIT OF MANDAMUS OR

PROHIBITION PER NRAP 21(a)(6) AND NRAP 27(e)”

IN EXCESS OF FIFTEEN PAGES

I. INTRODUCTION

Petitioner, Minh Luong, by and through her attorney, Marshal S. Willick, Esq., of the Willick Law Group, and pursuant to NRAP 27(d)(2), moves this Court for permission to file her *Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e)*” in excess of 7,000 words under the type/volume limits based upon the below Points and Authorities.

POINTS AND AUTHORITIES

The underlying record in this case is well over 20 volumes in length. The fact section for the Petition alone, which was made as summary as we thought possible without mischaracterizing the record, consumed more than the rule allows for the entire brief.

Looking at the alternatives, we thought it better to provide the entire record and this motion than to eliminate the background facts, as we believed the Court would want the entire factual backstory available in evaluating whether to grant the writ petition.

Minh requests the Court either allow, accept and file her Petition in excess of the limitation, or in the alternative, only consider the argument section when measuring the length of the Petition, which is well within the limit.

Dated this 7th day of April, 2022.

Respectfully submitted,
WILICK LAW GROUP

//s//Marshal S. Willick, Esq.

Marshal S. Willick, Esq.
Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of WILLICK LAW GROUP and that on this 8th day of April, 2022, a document entitled *Petitioner's Motion to file Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e)* in Excess of Fifteen Pages was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

Robert P. Dickerson, Esq.
Nevada Bar No. 945
DICKERSON/KARACSONYI LAW GROUP
1745 Village Center Circle
Las Vegas, Nevada 89134
(702) 388-0210
Email info@TheDKlawgroup.com

The Hon. Dawn Throne
Family Court, Dept. U
601 North Pecos Road
Las Vegas, Nevada 89155

//s//Justin K. Johnson

An Employee of WILLICK LAW GROUP

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