

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.

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. 84345

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**JOINT APPENDIX,
VOLUME NO. 56**

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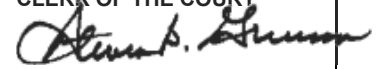
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DISTRICT COURT

CLARK COUNTY, NEVADA

180 LAND CO LLC, a Nevada limited liability
company, FORE STARS, LTD., a Nevada
limited liability company and SEVENTY
ACRES, LLC, a Nevada limited liability
company, DOE INDIVIDUALS I-X, DOE
CORPORATIONS I-X, and DOE LIMITED
LIABILITY COMPANIES I-X,

Plaintiffs,

v.

CITY OF LAS VEGAS, a political subdivision of
the State of Nevada; ROE GOVERNMENT
ENTITIES I-X; ROE CORPORATIONS I-X;
ROE INDIVIDUALS I-X; ROE LIMITED-
LIABILITY COMPANIES I-X; ROE QUASI-
GOVERNMENTAL ENTITIES I-X,

Defendants.

Case No. A-17-758528-J

Dept. No. XVI

**CITY'S EX PARTE APPLICATION
AND MOTION FOR LEAVE TO FILE
OPPOSITION TO DEVELOPER'S
MOTION TO DETERMINE TAKE AND
MOTION FOR SUMMARY JUDGMENT
ON THE FIRST, THIRD AND FOURTH
CLAIMS FOR RELIEF AND
COUNTERMOTION FOR SUMMARY
JUDGMENT THAT EXCEEDS EDCR
2.20 PAGE LIMIT**

*Filed Concurrently with Opposition to
Motion to Determine Take and Motion for
Summary Judgment on the First, Third and
Fourth Claims for Relief and Countermotion
for Summary Judgment*

HEARING NOT REQUESTED

The City of Las Vegas, by and through its undersigned counsel, hereby requests leave to file an Opposition to Motion to Determine Take and Motion for Summary Judgment on First, Third and Fourth Claims for Relief and Counter-Motion for Summary Judgment that exceeds the page limit in EDCR 2.20(a).

1 This request is necessary because the Developer's Motion Determine Take and Motion for
2 Summary Judgment on First, Third and Fourth Claims for Relief ("Take Motion") is 44 pages long
3 and was filed with a multi-volume appendix consisting of more than 150 exhibits. In order to respond
4 to the misrepresentations of fact and law contained in the Take Motion and the mountain of irrelevant
5 evidence that the Developer has filed with it, the City respectfully requests that the Court grant this
6 motion for leave to file an opposition and counter-motion that exceeds the thirty-page limit. The City's
7 opposition and counter-motion is filed concurrently.

8 DATED this 25th day of August 2021.

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10 By: /s/ George F. Ogilvie III
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 25th day of August, 2020, I caused a true and correct copy of the foregoing **CITY'S EX PARTE APPLICATION AND MOTION FOR LEAVE TO FILE OPPOSITION TO DEVELOPER'S MOTION TO DETERMINE TAKE AND MOTION FOR SUMMARY JUDGMENT ON THE FIRST, THIRD AND FOURTH CLAIMS FOR RELIEF AND COUNTERMOTION FOR SUMMARY JUDGMENT THAT EXCEEDS EDCR 2.20 PAGE LIMIT** to be electronically served with the Clerk of the Court via the Clark County District Court Electronic Filing Program which will provide copies to all counsel of record registered to receive such electronic notification.

/s/ Jelena Jovanovic

An employee of McDonald Carano LLP