

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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No. 84640

**LANDOWNERS'
MOTION FOR EXTENSION OF
TIME TO FILE COMBINED
ANSWERING BRIEF [84345]
AND OPENING BRIEF [84640]
(First Request)**

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**LANDOWNERS' MOTION FOR EXTENSION OF TIME TO FILE
COMBINED ANSWERING BRIEF [84345] AND OPENING BRIEF [84640]
(First Request)**

Landowners respectfully move this Court, pursuant to NRAP 31(b) for an extension of 30 days in which to file their combined answering brief in Docket No. 84345 and opening brief in Docket No. 84640.

On September 7, 2022, the Court entered an order granting the stipulation of the parties modifying the briefing schedule, which set October 17, 2022 as the deadline for the City's opening brief based upon the City's request for a second extension of time.

Landowners' combined brief is currently due on November 16, 2022. No request for additional time has been denied or denied in part. If this Court grants this request for a 30-day extension, Landowners' combined brief will be due Friday, December 16, 2022.

Good cause exists to grant the requested extension for the following reasons:

1. As Landowners expressed in their opposition filed on October 27, 2022, they prefer to include any response to City of Reno's amicus brief (if allowed by the Court) within their combined answering brief on appeal and opening brief on cross-appeal. The Court has not yet ruled on City of Reno's requested extension of time to file its amicus brief until

November 18, 2022. Thus, under the current timeline, Landowners would not be able to include a potential response to City of Reno’s amicus brief (if allowed) within Landowners’ combined brief filed on November 16, 2022. Thus, the extra time is necessary for Landowners to receive and respond to a potential amicus brief from City of Reno.

2. The Court allowed the City to file an overlength opening brief on October 17, 2022, which consists of 21,675 words. Landowners have worked diligently to prepare their combined brief. However, Landowners are working to respond to not only the legal arguments presented in the City’s opening brief, but also the factual recitation in the City’s opening brief that omits many of the factual grounds supporting Landowners’ legal arguments.

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For the foregoing reasons, Landowners respectfully request a 30-day extension, until December 16, 2022, within which to file their combined answering brief in Docket No. 84345 and opening brief in Docket No. 84640. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 15th day of November 2022.

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/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 FOR EXTENSION OF TIME TO FILE COMBINED ANSWERING BRIEF [84345] AND OPENING BRIEF [84640] (First Request)** with the Supreme Court of Nevada on the 15th day of November 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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