

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

Electronically Filed
Dec 16 2022 10:40 AM
Elizabeth A. Brown
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 FOR EXTENSION OF
TIME TO FILE COMBINED
ANSWERING BRIEF [84345]
AND OPENING BRIEF [84640]
(Second Request)**

LAW OFFICES OF KERMITT L. WATERS

Kermitt L. Waters, Esq.

Nevada Bar No. 2571

kermitt@kermittwaters.com

James J. Leavitt, Esq.

Nevada Bar No. 6032

jim@kermittwaters.com

Michael A. Schneider, Esq.

Nevada Bar No. 8887

michael@kermittwaters.com

Autumn L. Waters, Esq.

Nevada Bar No. 8917

autumn@kermittwaters.com

704 South Ninth Street

Las Vegas, Nevada 89101

Telephone: (702) 733-8877

Facsimile: (702) 731-1964

CLAGGETT & SYKES LAW FIRM

Micah S. Echols, Esq.

Nevada Bar No. 8437

micah@claggettlaw.com

4101 Meadows Lane, Suite 100

Las Vegas, Nevada 89107

(702) 655-2346 – Telephone

(702) 655-3763 – Facsimile

Attorneys for 180 Land Co., LLC and Fore Stars Ltd.

**LANDOWNERS' MOTION FOR EXTENSION OF TIME TO FILE
COMBINED ANSWERING BRIEF [84345] AND
OPENING BRIEF [84640]
(Second 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 was originally due November 16, 2022. This Court previously granted an extension of time to December 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 Tuesday, January 17, 2023.

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

1. Counsel for Landowners have worked diligently to draft the combined brief to meet the current filing deadline. The combined brief responds to the City of Las Vegas' lengthy opening brief and an amicus brief filed by the City of Reno, while also including the Landowners

arguments for their Opening brief on cross appeal. The draft of the combined brief is now close enough in progress that it can be sent to co-counsel and Landowners for review next week. Given the complex nature and numerous issues raised by this appeal, it is vital that Landowners and co-counsel have sufficient time to review the combined brief prior to filing. The additional time will also allow for the revision process of co-counsel and client, in light of the upcoming holidays.

For the foregoing reasons, Landowners respectfully request a 30-day extension, until January 17, 2023, 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 16th day of December 2022.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols, Esq.

LAW OFFICES OF KERMITT L. WATERS
Kermitt L. Waters, Esq.
James J. Leavitt, Esq.
Michael A. Schneider, Esq.
Autumn L. Waters, Esq.

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] (Second Request)** with the Supreme Court of Nevada on the 16th day of December 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

George F. Ogilvie III, Esq.
gogilvie@mcdonaldcarano.com
John Christopher Molina, Esq.
cmolina@mcdonaldcarano.com

Amanda C. Yen, Esq.
ayen@mcdonaldcarano.com
McDONALD CARANO LLP
2300 West Sahara Avenue, Ste., 1200 Las Vegas, Nevada 89102
(702) 873-4100 – Telephone

Bryan K. Scott, Esq.
bscott@lasvegasnevada.gov
Philip R. Byrnes, Esq.
pbyrnes@lasvegasnevada.gov
Rebecca L. Wolfson, Esq.
rwolfson@lasvegasnevada.gov
LAS VEGAS CITY ATTORNEYS' OFFICE
495 South Main Street, 6th Floor, Las Vegas, Nevada 89101
(702) 229-6629 – Telephone

Andrew W. Schwartz (pro hac vice)
schwartz@smwlaw.com
Lauren M. Tarpey (pro hac vice)
ltarpey@smwlaw.com
396 Hayes Street San Francisco, California 94102
SHUTE, MIHALY & WEINBERGER, LLP
(415) 552-7272 – Telephone

Debbie A. Leonard, Esq.
debbie@leonardlawpc.com
LEONARD LAW, PC
955 South Virginia Street, Ste. 220, Reno, Nevada 89502
(775) 964-4656 – Telephone

*Attorneys for Appellant and Respondent/Cross-Appellant,
City of Las Vegas*

Kermitt L. Waters, Esq.
kermitt@kermittwaters.com
James J. Leavitt, Esq.,
jim@kermittwaters.com
Michael Schneider, Esq.
michael@kermittwaters.com
Autumn L. Waters, Esq.
autumn@kermittwaters.com
LAW OFFICES OF KERMITT L. WATERS
704 South 9th Street, Las Vegas, Nevada 89101
(702) 733-8877 – Telephone

Elizabeth Ghanem Ham, Esq.
EHB Companies, LLC
1215 South Fort Apache Road, Ste. 120, Las Vegas, Nevada 89117
eham@ehbcompanies.com
(702) 940-6930 – Telephone

*Attorneys for Respondents and Appellants/Cross-Respondents,
180 Land Co., LLC, and Fore Stars Ltd.*

Karl Hall
Reno City Attorney
Jonathan Shipman
Nevada Bar 5778
City of Reno
1 E. First Street
P.O. Box 1900
Reno, Nevada 89505

Steven M. Silva
Nevada Bar 12492
NOSSAMAN, LLP
895 Pinebrook Road
Reno, Nevada 89509
Telephone: 775-895-3036
Facsimile: 916-930-7707

Attorneys for Proposed Amicus Curiae

/s/ Anna Gresl

Anna Gresl, an employee of
CLAGGETT & SYKES LAW FIRM