

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

**Case No. 84345**

**and**

**Case No. 84640**

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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

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District Court Case No.: A-17-758528-J  
Eighth Judicial District Court of Nevada

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**APPELLANT CITY OF LAS VEGAS'  
MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF ON APPEAL AND  
ANSWERING BRIEF ON CROSS-APPEAL**

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*Attorneys for Appellant City of Las Vegas*

Pursuant to NRAP 26(b)(1) and NRAP 27(a)(1), Appellant City of Las Vegas respectfully moves the Court for an extension of time to file its Reply Brief on Appeal and Answering Brief on Cross-Appeal. The current deadline is February 16, 2023.

On February 1, 2023, the City filed a Motion to Strike the “Landowners’ Appendix” and Answering Brief due to the improper inclusion of, and reliance upon, matters outside the record by Respondents 180 Land, LLC and Fore Stars Ltd. (collectively, “the Developer”). In its Motion to Strike, the City requests that the Court strike the Developer’s rogue Appendix and Brief and order the Developer to re-file a compliant brief that removes all references to unauthorized material.

Pursuant to the Court’s February 8, 2023 order granting the Developer’s extension request, the Developer’s Opposition to the Motion to Strike is now due February 22, 2023. The City’s reply will be due seven days thereafter. *See* NRAP 27(a)(4). As a result, briefing on the Motion to Strike will still be ongoing when the City’s Reply Brief on Appeal and Answering Brief on Cross-Appeal are due.

The Court’s decision on the City’s Motion to Strike will determine the scope and content of the City’s brief. As a result, an extension of time until the Court decides the Motion to Strike will make the best use of the parties’ and the Court’s resources. The City requests an extension of the deadline to file its Reply Brief on

Appeal and Answering Brief on Cross-Appeal until 30 days after the Court decides its Motion to Strike.

Additionally, the Developer's brief is 37,702 words, which is over twice the word limit allowed by NRAP 28.1(e)(2). The City's Reply brief will require a significant amount of time to analyze the Developer's extensive arguments and draft a cogent and thorough response. On this basis as well, the City requests an extension of time.

Counsel for the City is diligently working to draft the Reply Brief on Appeal and Answering Brief on Cross-Appeal. Based on the foregoing, however, the City submits that good cause exists for the requested extension. This motion is brought in good faith and not for the purpose of delay.

DATED: February 8, 2023

By: /s/ Debbie Leonard

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*Attorneys for Appellant 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 8, 2023

/s/ Tricia Trevino

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