

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

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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

**MOTION FOR EXTENSION
OF TIME TO FILE
OPPOSITION TO CITY'S
MOTION FOR EXTENSION
OF TIME TO FILE REPLY
BRIEF ON APPEAL AND
ANSWERING BRIEF ON
CROSS-APPEAL AND
MOTION FOR LEAVE TO
FILE LATE OPPOSITION**

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**MOTION FOR EXTENSION OF TIME TO FILE
OPPOSITION TO CITY’S MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF ON APPEAL AND ANSWERING BRIEF
ON CROSS-APPEAL (First Request)
and
MOTION FOR LEAVE TO FILE LATE OPPOSITION**

Landowners respectfully move this Court pursuant to NRAP 26(b)(1)(A) for an extension of two days in which to file their opposition to City’s motion for extension of time to file reply brief on appeal and answering brief on cross-appeal and for permission to file their late opposition.

Landowners’ opposition was originally due on February 15, 2023. Concurrently with this motion, Landowners submit their opposition. No request for additional time has been denied or denied in part.

Good cause exists to grant the requested extension and to allow late filing of Landowners’ opposition.

Landowners failed to timely file their opposition because Mr. Echols, who is one of the appellate attorneys for this appeal, was in a jury trial from January 3, 2023 through February 7, 2023. On the following day, February 8, Mr. Echols was out of the jurisdiction for a medical appointment for one of his minor children. In the following days, Mr. Echols reviewed hundreds of emails that amassed while he was in the

jury trial and did not have the opportunity to confer with his clients, Landowners, until after the time for filing the opposition had passed. Landowners now submit their opposition together with this motion.

In summary, Landowners respectfully urge this Court to grant a new filing deadline of their opposition until February 17, 2023, and allow the late filing of the opposition. Landowners submit this motion in good faith and for good cause shown in accordance with NRAP 26(b)(1)(A).

Dated this 17th day of February 2023.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Micah S. Echols, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION TO CITY'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF ON APPEAL AND ANSWERING BRIEF ON CROSS-APPEAL (First Request) and MOTION FOR LEAVE TO FILE LATE OPPOSITION** with the Supreme Court of Nevada on the 17th day of February 2023. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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