

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

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MINH NGUYET LUONG,

S.C. No.:

D.C. Case No.:

Appellant,

Electronically Filed  
May 23 2022 04:15 p.m.  
D-18-58144-D  
Elizabeth A. Brown  
Clerk of Supreme Court

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF NEVADA, IN  
AND FOR THE COUNTY OF CLARK, AND  
THE HONORABLE DAWN THRONE,  
DISTRICT COURT JUDGE,

and

JAMES W. VAHEY,

Real Party in Interest.

**PETITIONER'S MOTION TO FILE**

**“EMERGENCY PETITION FOR WRIT OF MANDAMUS OR**

**PROHIBITION PER NRAP 21(a)(6) AND NRAP 27(e)”**

**IN EXCESS OF FIFTEEN PAGES**

## **I. INTRODUCTION**

Petitioner, Minh Luong, by and through her attorney, Marshal S. Willick, Esq., of the Willick Law Group, and pursuant to NRAP 27(d)(2), moves this Court for permission to file her *Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e)*” in excess of 7,000 words under the type/volume limits based upon the below Points and Authorities.

## **POINTS AND AUTHORITIES**

As this Court is aware, the underlying record submitted with the prior writ petition was well over 21 volumes in length; another volume, with transcripts, was added for this petition, the substantive portion of which is some 9,300 words.

Looking at the alternatives, we thought it better to provide the entire record and this motion than to eliminate any of the documentation or facts we think the Court would want in evaluating whether to grant the writ petition.

Minh requests the Court either allow, accept and file her Petition in excess of the limitation, or in the alternative, direct us to remove material, which can be done, but it is believed at the loss of a coherent explanation of what has happened, why, and the legal citations showing why writ relief is appropriate.

Dated this 23rd day of May, 2022.

Respectfully submitted,  
WILLICK LAW GROUP

//s// Marshal S. Willick  
Marshal S. Willick, Esq.  
Attorneys for Petitioner

## CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of WILLICK LAW GROUP and that on this 23rd day of May, 2022, a document entitled *Petitioner's Motion to file Emergency Petition for Writ of Mandamus or Prohibition per NRAP 21(a)(6) and NRAP 27(e)" in Excess of Fifteen Pages* was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

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The Hon. Dawn Throne  
Family Court, Dept. U  
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//s//Justin K. Johnson

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