IN THE SUPREME COURT OF THE STATE OF NEVADA

LAS VEGAS REVIEW-JOURNAL, INC..

Petitioner,

vs.

CLARK COUNTY EIGHT JUDICIAL DISTRICT COURT,

Respondent.

Supreme Court No: 85228 Electronically Filed Nov 07 2022 02:46 PM Elizabeth A. Brown Clerk of Supreme Court

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF

Respondent, Clark County Eight Judicial District Court, by and through their attorneys Nevada Attorney General Aaron D. Ford and Deputy Solicitor General Jeffrey M. Conner, hereby submit this Unopposed Motion for Extension of Time to file an Answer in this matter from the current deadline of November 8, 2022, to November 29, 2022. Counsel has contacted counsel for the Petitioner, Margaret A. McLetchie, who indicated that she does not oppose this request.

This motion is made under NRAP 26(b), is not made for purposes of delay or any other improper purpose and is based on the following Declaration of Jeffrey M. Conner.

RESPECTFULLY SUBMITTED this 7th day of November 2022.

AARON D. FORD Attorney General

By: <u>/s/Jeffrey M. Conner</u>
JEFFREY M. CONNER, NB#11543
Deputy Solicitor General
100 N. Carson St.
Carson City, Nevada 89701
775-684-1136
jconner@ag.nv.gov

Attorneys for Respondent

DECLARATION OF JEFFREY M. CONNER

- I, Jeffrey M. Conner, declare under penalty of perjury:
- 1. I am an attorney employed by the Nevada Attorney General's Office, and I am counsel of record for the Respondent in this matter.
- 2. I respectfully request an extension of twenty-one days, to and including November 29, 2022, which is necessary for me to effectively represent the Respondent's interests in this writ proceeding. This is the first request for an extension of time to answer the petition.
- 3. In addition to completing ordinary day-to-day tasks, since this Court ordered a response to the writ petition in this matter, I have remained extremely busy addressing time-sensitive issues in the appeals this Court consolidated under Sullivan, P.E. v. Lincoln County Water Dist., No. 84739, drafting an emergency writ petition in Department of Public and Behavioral Health v. Eighth Jud. Dist. Ct., No. 85554, and preparing for an upcoming argument in Agavo v. Johnson, No. 21-16908 (9th Cir.). Due to the extensive amount of time I have needed to devote to those other cases, I need additional time to complete a response to the writ petition in this matter.
- 4. The request for additional time is unopposed. I communicated with opposing counsel, Margaret A. McLetchie on Friday, November 4,

2022, and she indicated that she has no opposition to Respondent's request for additional time.

I declare under penalty of perjury that the foregoing is true and correct.

Dated November 7, 2022.

<u>/s/ Jeffrey M. Conner</u> Jeffrey M. Conner

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada Office of the Attorney General and that on this 7th day of November 2022, I filed and served the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER with the Clerk of the Court of the Supreme Court of Nevada. Registered parties will be served electronically.

Margaret A. McLetchie, Nevada Bar No. 10931 Leo S. Wolpert, Nevada Bar No. 12658 MCLETCHIE LAW 602 South Tenth St. Las Vegas, Nevada 89101 Counsel for Las Vegas Review-Journal, Inc.

<u>/s/Sandra Geyer</u>

An Employee of the State of Nevada Office of the Attorney General