

In the Supreme Court of Nevada

A CAB SERIES LLC f/k/a/ A CAB, LLC,

Appellant,

vs.

MICHAEL MURRAY; and MICHAEL
RENO, individually and on behalf of
others similarly situated,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

**REPLY IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO FILE
APPELLANT’S OPENING BRIEF AND APPENDIX**

Respondents’ point out, rightly, that A Cab’s second motion for extension was not accompanied by a supporting declaration. Resp. in Opp. to Mot. to Extend 2 & n. 1. This is well-taken. Although this Court has not historically required separate declarations from counsel, A Cab’s counsel now provides a declaration in support of its prior motion. *See*. Decl. of Abraham Smith.

As stated, extraordinary circumstances and extreme need necessitate this extension. Respondents claim that A Cab “does not explain” the need for this extension other than the availability of trial counsel. Opp. at 2. This is untrue.

A Cab's second motion for extension explained that various sicknesses had delayed progress on the brief and appendix. Abraham Smith, who would review and finalize the brief, was seriously ill over the holidays. He and his family have only recently recovered. Lead paralegal on this matter was likewise ill, requiring several days of full rest to restore her health. *Id.* at ¶ __. Added to this: since the second motion for extension was filed, another senior attorney on this case had to take unexpected medical leave. *Id.* at ¶ __. These circumstances only compound the difficulties associated with reviewing the lengthy record and preparing the sizeable appendices.¹

Still, A Cab has worked, and continues to work, diligently toward finalizing the opening brief and appendix. A Cab sincerely appreciates the Court's consideration.

¹ Respondents dispute the complexity of the record. But the appendices are only partially prepared, and already exceeds 5,000 pages.

Dated this 9th day of January, 2024.

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CERTIFICATE OF SERVICE

I certify that on January 9, 2024, I submitted the foregoing “Reply Brief on Motion for Extension of Time to File Appellant’s Opening Brief and Appendix” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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