

**In the  
Supreme Court of the State of Nevada**

NEVADA POLICY RESEARCH  
INSTITUTE,

Appellant,

vs.

BRITTNEY MILLER, an  
individual, et al.,

Respondents.

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Elizabeth A. Brown  
Clerk of Supreme Court

**Case No. 85935**

Appeal from Eighth Judicial  
District Court, Clark County,  
Nevada, Case No. A-20-817757-C

**RESPONDENT-LEGISLATORS' AND RESPONDENT-  
LEGISLATURE'S JOINT REPLY IN SUPPORT OF THEIR  
MOTION FOR EXTENSION OF TIME TO FILE ANSWERING  
BRIEF**

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## **MEMORANDUM OF POINTS AND AUTHORITIES**

Respondent-Legislators, Brittney Miller, Selena Torres, Dina Neal, and James Ohrenschall (collectively, “Legislators”), and Respondent The Legislature of the State of Nevada (“Legislature” and together with Legislators, “Respondents”), by and through their respective counsel of record, here submit their reply in support of their motion to extend the time within which to file their respective answering briefs.

Respondents understand the urgency with which NPRI approaches the subject matter of this case, and the zeal with which it pursues its aims. Basic accommodations to fellow counsel, however, are normally fairly routine. While counsel for Respondents will not be attaching here the receipts of their vacation reservations—though opposing counsel is invited to come view them to determine their purchase dates—the Court can be assured that the plans are longstanding and pre-paid, and the family vacations well-deserved.

The next regular session of the Nevada Legislature is 20 months in the future. Respondents received the opening brief of NPRI on June 7, 2023, immediately reached out to counsel to discuss an extension of time, and then timely filed the present motion. No counsel planned their family

trips with an eye towards delaying this appeal. Legal practice is hard on family life, and the rhythms of this career in Nevada almost always—save for exceptional circumstances—permit attorneys to snatch time in the heart of summer for vacations. Neither the complexities of this appeal, nor this Court, are particularly well-served by multiple lead attorneys for multiple respondents having their response time truncated unnecessarily.

Respondents ask their motion be granted.

DATED this 21st day of June, 2023.

By: /s/ Bradley Schrager  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of June, 2023, a true and correct copy of the foregoing **RESPONDENT-LEGISLATORS' AND RESPONDENT-LEGISLATURE'S JOINT REPLY IN SUPPORT OF THEIR MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF (FIRST REQUEST)** was served upon all counsel of record by electronically filing the document using the Nevada Supreme Court's electronic filing system.

By: /s/ Dannielle Fresquez

Dannielle Fresquez, an Employee of  
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