

Case No. 86501

In the Supreme Court of Nevada

SANDRA CAMACHO, and ANTHONY CAMACHO,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA, in and for the County of Clark;
and the HONORABLE NADIA KRALL,

Respondents,

and

PHILIP MORRIS USA, INC., a foreign corporation; R.J.
REYNOLDS TOBACCO COMPANY, a foreign corporation,
individually, and as successor-by-merger to
LORILLARD TOBACCO COMPANY and as successor-in-
interest to the United States tobacco business of
BROWN & WILLIAMSON TOBACCO CORPORATION, which
is the successor-by-merger to the AMERICAN TOBACCO
COMPANY; LIGGETT GROUP, LLC., a foreign
corporation; and ASM NATIONWIDE CORPORATION,
d/b/a SILVERADO SMOKES & CIGARS, a domestic
corporation; LV SINGHS INC. d/b/a SMOKES & VAPORS,
a domestic corporation,

Real Parties in Interest.

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Clerk of Supreme Court

District Court
Case No. A807650

**REAL PARTY IN INTEREST LIGGETT GROUP LLC'S
MOTION FOR EXTENSION OF TIME TO FILE
ANSWER TO PETITION FOR WRIT OF MANDAMUS**

and

**JOINDER IN PHILIP MORRIS USA INC.'S MOTION FOR
EXTENSION OF TIME TO FILE
ANSWER TO PETITION FOR WRIT OF MANDAMUS**

NRAP 26.1 DISCLOSURE

Counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed in order that the judges of this court may evaluate possible disqualification or recusal.

1. Liggett Group LLC's sole member is VGR Holding LLC.
2. VGR Holding LLC's sole member is Vector Group Ltd.
3. Vector Group Ltd.'s stock is publicly traded on the New York Stock Exchange.
4. Liggett Group LLC has been represented in this litigation by J Christopher Jorgensen, Daniel F. Polsenberg, and Abraham G. Smith of Lewis Roca Rothgerber Christie LLP; and Kelly Anne Luther of Kasowitz Benson Torres LLP.

DATED this 5th day of June, 2023.

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MOTION

Real party in interest Liggett Group LLC requests a 60-day extension of time, through August 22, 2023, to file its answer to the petition. NRAP 31(b)(3). This is the first request to extend this deadline. Without an extension, the answer would be due June 23, 2023.

Good cause necessitates this extension. This is a complex case. Petitioners filed an 89-page, 18,294-word writ petition, with an accompanying 62-volume appendix that spans over 9,500 pages. Given the nature of the facts and issues presented, a 60-day extension would afford Liggett a reasonable time to review the record, research the relevant caselaw, and draft its response to the oversized petition.

Additionally, Liggett's counsel are heavily involved in both pretrial motion practice and trial preparation in *Timothy A. Geist v. R.J. Reynolds Tobacco Company*, A-19-807653-C, another tobacco case, pending in the Eighth Judicial District Court, Clark County, Nevada, Department 27. The jury trial is scheduled to begin June 13, 2023, with jury selection, and is scheduled to continue at least through July 7, 2023. This is in addition to commitments and speaking engagements local counsel has as a Delegate of the Nevada

State Bar at this year's annual conference on June 21–23. Also, Liggett's counsel was preoccupied with preparing for an argument before the en banc Court today in *Starr Surplus Lines Ins. Co. v. District Court*, Case No. 84986.

JOINDER

Liggett joins in the request for extension filed by Phillip Morris USA Inc., for the reasons articulated in its June 1, 2023, motion.

For the foregoing reasons, Liggett respectfully requests a 60-day extension of time, until August 22, 2023, within which to file its answer to the petition.

DATED this 5th day of July, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2023, I submitted the foregoing
“Real Party in Interest Liggett Group LLC’s Motion for Extension of Time
to File Answer to Petition for Writ of Mandamus and Joinder in Philip
Morris USA Inc.’s Motion for Extension of Time to File Answer to Petition
for Writ of Mandamus ” for filing via the Court’s eFlex electronic filing
system. Electronic notification will be sent to the following:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

The Honorable Nadia Krall
DISTRICT COURT JUDGE – DEPT. 4
200 Lewis Avenue
Las Vegas, Nevada 89155

Respondent

/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber LLP