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2 **IN THE COURT OF APPEALS OF THE STATE OF NEVADA**

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Electronically Filed
Feb 14 2024 11:19 AM
Elizabeth A. Brown
Clerk of Supreme Court

ROCHELLE MEZZANO,

Appellant,

No. 87863-COA

vs.

JOHN TOWNLEY,

Respondent.

OPPOSITION TO MOTION FOR EXCESS PAGES

Respondent, John Townley, through counsel, hereby opposes Appellant's Motion for Excess Pages. Appellant's proposed reply is twice the permitted length and is an inappropriate attempt to sandbag and present arguments when Mr. Townley has no response right. Motions to exceed page limitations are disfavored. Appellant's motion should be denied.

This Opposition is made and based on the Nevada Rules of Appellate Procedure, including NRAP 27 and NRAP 32(a)(7)(D), the points and authorities herein, the record on appeal, and any evidence and argument presented in support of this Opposition at a hearing before this Court.

POINTS AND AUTHORITIES

Appellant complains that Mr. Townley's opposition raised "too many issues to respond to in just five pages." (Mot., p. 2, lines 1-2.) Yet, Mr. Townley's

1 opposition did not raise issues outside of the scope of the original motion. The
2 obligation was on Ms. Mezzano to identify the legal and factual basis for the relief
3 she sought. Mr. Townley's opposition simply directs the Court to existing Nevada
4 law that establishes Ms. Mezzano will not prevail on appeal because she failed to
5 respond to requests for admission and failed to raise issues in the trial court.
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8 Appellant had an opportunity to explain why controlling Nevada law does
9 not apply to her in her motion. She did not. The request for additional pages seeks
10 license for Appellant to sandbag and present arguments to which Mr. Townley
11 cannot respond.
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13 CONCLUSION

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15 Appellant has wound the legal system into knots by evading and ignoring
16 the rules, including by suing the Second Judicial District Court. She must see value
17 in doing so and, as the past is a reliable indicator of the future, will continue unless
18 this Court takes control and exercises a firm hand. There is also the danger that
19 future litigants will learn from and mimic Appellant's behavior, which will make
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1 the resolution of all cases more difficult. Therefore, John Townley respectfully
2 requests this Court enforce its rules and deny Appellant's Motion for Excess Pages.

3 Under NRS 239B.030 the undersigned affirms the preceding contains no
4 social security number.
5

6 Dated this 14 day of Feb 2024.
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10 ALEXANDER MOREY
11 SILVERMAN KATTELMAN SPRINGGATE,
12 CHTD.

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Pursuant to NRCP 5 (b), I hereby certify that I am an employee of Silverman, Kattelman Springgate, Chtd, and on the date set forth below, I served a true copy of the foregoing **Opposition to Motion for Excess Pages** the party(ies) identified below by:

8
9 — Placing an original or true copy thereof in a sealed envelope, postage
10 prepaid for collection and mailing in the United States Mail at Reno,
11 Nevada to

13 X Electronically, using Supreme Court's Eflex system.

14 | Email: _____

16 addressed to:

17 F. Peter James, Esq.
18 Law Offices of F. Peter James, Esq.
19 3821 West Charleston Blvd., Ste. 250
Las Vegas, NV 89102

21 Under NRS 239B.030 the undersigned affirms the preceding contains no
22 social security number.

24 Dated this 14 day of Feb, 2024.

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