

IN THE SUPREME COURT OF THE STATE OF NEVADA

STATE OF NEVADA,
Appellant

vs.

JAMES WALTER DEGRAFFENREID III,
DURWARD JAMES HINDLE III, JESSE
REED LAW, MICHAEL JAMES
MCDONALD, SHAWN MICHAEL
MEEHAN, AND EILEEN A. RICE,
Respondents.

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Clerk of Supreme Court

CASE NO.: 89064

Dist. Ct. No.:
C-23-379122-1
C-23-379122-2
C-23-379122-3
C-23-379122-4
C-23-379122-5
C-23-379122-6

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE REPLY
TO STATE OF NEVADA'S RESPONSE TO RESPONDENTS' MOTION
TO DISMISS (First Request)**

Respondents JAMES WALTER DEGRAFFENREID III, DURWARD
JAMES HINDLE III, JESSE REED LAW, MICHAEL JAMES MCDONALD,
SHAWN MICHAEL MEEHAN, and EILEEN A. RICE respectfully move, pursuant
to NRAP 26(b)(1)(A), to extend the deadline to file a Reply to State of Nevada's

Response to Respondent's Motion to Dismiss for a period of two (2) judicial days from November 7, 2024, to November 12, 2024.¹

This motion for extension of time is supported by good cause under NRAP 26(b)(1)(A), NRAP 31(b)(3)(B).

Good cause exists for seeking the instant extension.

Counsel for all six (6) respondents will be filing a joint reply, and while counsel has been diligently working on the briefing, the lead drafter, Margaret McLetchie, is preparing for oral argument before this Court in *In Re: Public Records Request to Las Vegas Metropolitan Police Department* (Case number 85598), which is scheduled for oral argument on November 7, 2024. Additionally, counsel has been drafting the Opposition to State of Nevada's Countermotion to Strike that was filed along with its Response to Respondent's Motion to Dismiss.² Counsel for other respondents have been occupied with other election-related matters and activity and have been unable to assist with the drafting of the Reply.

Counsel attempted to reach an agreement with counsel for the State for the two (2) day extension; however, the Attorney General's Office would not agree to even the short continuance of the deadline requested.

¹ The current deadline is November 7, 2024; Monday November 11, 2024, is a court holiday as it is Veterans Day.

² This request only seeks to extend to time to file the Reply to the Response; counsel for Respondents will file the Opposition to the Countermotion to Strike by the current deadline of November 7, 2024.

The two (2) judicial day extension request is made in good faith, and not for purposes of delay.

For these reasons, Respondents respectfully request a two (2) judicial day extension of the deadline within which to file a Reply to State of Nevada's Response to Respondents' Motion to Dismiss.

DATED this 6th day of November, 2024.

/s/ Richard A. Wright
Richard A. Wright
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/s/ Monti Jordana Levy
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/s/ Margaret A. McLetchie
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/s/ Sigal Chattah

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/s/ George P. Kelesis

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Counsel for James Walter Degraffenreid, III

**DECLARATION OF MARGARET A. MCLETCHIE, ESQ. IN SUPPORT
OF MOTION FOR EXTENSION**

I, MARGARET A. MCLETCHIE, ESQ., declare as follows:

1. I am duly licensed to practice law in the state of Nevada and am managing partner of McLetchie Law Group, PLLC (“McLetchie Law”). McLetchie Law is counsel for Respondent Jesse Reed Law in the above-captioned appeal.

2. Respondents now respectfully request to extend the deadline to file a Reply to State of Nevada’s Response to Respondents’ Motion to Dismiss. Specifically, Respondents request an extension of two (2) judicial days, up to and including **November 12, 2024.**

3. Good cause exists for the following reasons:

- a. This is a joint Reply, which is more efficient for the Court and the State, but requires extra coordination between the six defendants’ co-counsel.
- b. Co-counsel and I have varying scheduling conflicts with other legal matters which, despite diligent effort, have prevented sufficient briefing of the issues and arguments.
- c. I have oral argument before this Court on November 7, 2024, in the case of *In Re Public Records Request to Las Vegas Metropolitan Police Department (Case number 85598)*. As such, I have been preparing diligently for that argument and have not had sufficient time to draft the Reply in this matter.

d. Counsel for other respondents have been unavailable to assist as they have been working on other time sensitive election-related matters.

4. Despite the diligent work of myself and co-counsel, I request this extension so that Respondents' counsel will have sufficient time to finish researching and drafting the Reply to State of Nevada's Response to Respondents' Motion to Dismiss.

5. Counsel for Respondents will also be filing an Opposition to the State of Nevada's Countermotion to Strike, but are not seeking to extend that deadline.

6. This request is made in good faith and not for purposes of delay.

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

DATED this 6th day of November, 2024.

/s/ Margaret A. McLetchie
Margaret A. McLetchie, Nevada Bar No. 10931

CERTIFICATE OF SERVICE

I hereby certify that the foregoing RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS (First Request) was filed electronically with the Nevada Supreme Court on the 6th day of November, 2024. Electronic service of the foregoing document shall be made in accordance with the Master Service List.

/s/ Leo S. Wolpert
Employee of McLetchie Law