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Attorneys for Real Party in Interest,

Aaron M. Morgan

IN THE SUPREME COURT OF THE STATE OF NEVADA

HARVEST MANAGEMENT SUB LLC,

Petitioner,

v.

Case No.: 80837

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
CLARK; and THE HONORABLE
LINDA MARIE BELL,

Respondents,

and

AARON M. MORGAN; and DAVID E.
LUJAN,

Real Parties in Interest.

MOTION FOR EXTENSION OF TIME TO FILE
REAL PARTY IN INTEREST’S ANSWER TO PETITION FOR
EXTRAORDINARY WRIT RELIEF
(First Request)

Real Party in Interest, Aaron M. Morgan (“Morgan”), by and through his counsel of record, Benjamin P. Cloward, Esq. and Bryan A. Boyack of Richard Harris Law Firm; and Micah S. Echols, Esq. of Claggett & Sykes Law Firm, hereby moves this Court pursuant for an extension of 30 days to file Morgan’s answer to petition for extraordinary writ relief. This is the first motion for extension on Morgan’s answer. Without an extension, the answer would be due on April 30, 2020. No request for additional time has been denied or denied in part.

Good cause exists for allowing Morgan to extend the filing deadline for his answer to petition for extraordinary writ relief until June 1, 2020:

1. Following Governor Sisolak’s initial COVID-19 press conference, Morgan’s counsel began transitioning its employees to work remotely pursuant to

an Order issued by Sisolak closing all nonessential businesses and urging all workers, who can work remotely, to do so. This transition has caused unprecedented delays as a result of not having full workstations, IT issues, limitations of team collaboration on this case and the overall quarantine situation.

2. Additionally, several administrative orders have been issued in Nevada courts changing procedures for routine activities in response to COVID-19, and on short notice. The rapid changes in our community and our court system over the past five weeks has understandably diverted attention elsewhere.

3. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). Therefore, Mr. Morgan respectfully request that this Court grant his motion for a 30-day extension of time to file his answer until June 1, 2020.

DATED this 30th day of April, 2020

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
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Aaron M. Morgan

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE REAL PARTY IN INTEREST'S ANSWER TO PETITION FOR EXTRAORDINARY WRIT RELIEF (FIRST REQUEST)** with the Nevada Supreme Court on the 30th day of April, 2020.

Electronic Service of the foregoing document shall be made in accordance with the Master Service List as Follows:

Benjamin Cloward
Bryan Boyack
Dennis Kennedy
Andrea Champion
Sarah Harmon

/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm