

Richard Harris Law Firm

Benjamin P. Cloward, Esq.

Nevada Bar No. 11087

Bryan A. Boyack, Esq.

Nevada Bar No. 9980

801 South Fourth Street

Las Vegas, Nevada 89101

Telephone: (702) 444-4444

Facsimile: (702) 444-4455

Benjamin@RichardHarrisLaw.com

Bryan@RichardHarrisLaw.com

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Elizabeth A. Brown
Clerk of Supreme Court

Claggett & Sykes Law Firm

Micah S. Echols, Esq.

Nevada Bar No. 8437

4101 Meadows Lane, Suite 100

Las Vegas, Nevada 89107

Telephone: (702) 655-2346

Facsimile: (702) 655-3763

micah@claggettlaw.com

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
(Second 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 Honorable Court for an extension of 30-days to file Morgan’s answer to petition for extraordinary writ relief.

Morgan’s answer to petition for extraordinary writ relief is currently due June 1, 2020. This Court previously granted a first extension of time to June 1, 2020.

If this Court grants this request for a 30-day extension of time, Morgan’s answer will be due on July 1, 2020. Good cause exists for allowing Morgan to extend the filing deadline until July 1, 2020:

On March 12, 2020 Governor Sisolak declared a state of emergency in Nevada in response to the recent outbreak of COVID-19 to which Morgan's counsel and counsel's employees have continued to work remotely pursuant to Sisolak's recommendation, which has continued to present challenges, limitations and delays.

Despite the shutdown, the great majority of filing deadlines have not been suspended indefinitely. Therefore, Morgan's counsel has been required to juggle deadlines in the District Court, Supreme Court, and other appellate courts, with the difficulty of having each member of the appellate team in a different location, with added responsibilities that come from working at home. Accordingly, normal tasks take longer, including the preparation of Morgan's answer in the instant case. No prejudice will result from the extension because there are no pending deadlines in the District Court.

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This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1). Therefore, Morgan respectfully request that this Court grant his motion for a 30-day extension of time to file his answer until July 1, 2020.

DATED this 1st day of June, 2020

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
Micah S. Echols, Esq.
Nevada Bar No. 8437
4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107
Attorneys for Real Party in Interest,
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 (SECOND REQUEST)** with the Nevada Supreme Court on the 1st day of June, 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