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HARVEST MANAGEMENT SUB LLC

IN THE SUPREME COURT OF THE STATE OF NEVADA

HARVEST MANAGEMENT SUB  
LLC,

Petitioner,

vs.

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

Respondent,

and

AARON M. MORGAN and DAVID  
E. LUJAN,

Real Parties in  
Interest.

Electronically Filed  
Jul 28 2020 08:56 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Supreme Court No. 80837

District Court No. A-15-718679-C

**STIPULATION FOR  
EXTENSION OF TIME TO  
FILE PETITIONER'S REPLY  
IN SUPPORT OF PETITION  
FOR EXTRAORDINARY WRIT  
RELIEF AND ANSWER TO  
CROSS-PETITION FOR WRIT  
OF MANDAMUS OR  
PROHIBITION**

**STIPULATION FOR EXTENSION OF TIME TO FILE  
PETITIONER’S REPLY IN SUPPORT OF PETITION FOR  
EXTRAORDINARY WRIT RELIEF AND ANSWER TO CROSS-  
PETITION FOR WRIT OF MANDAMUS OR PROHIBITION**

Pursuant to NRAP 26(b)(2) and 31(b)(2), Petitioner Harvest Management Sub LLC, by and through its counsel of record, Bailey❖Kennedy, and Real Party in Interest Aaron M. Morgan, by and through his counsel, Claggett and Sykes and the Richard Harris Law Firm,<sup>1</sup> hereby stipulate and agree that the time to file Petitioner’s Reply in Support of Petition for Extraordinary Writ Relief be extended for a period of forty-five days from August 3, 2020, to September 17, 2020. No previous extensions of time for filing Petitioner’s Reply in Support of Petition for Extraordinary Writ Relief have been sought or granted.

The Parties further stipulate and agree that Petitioner’s response to the Real Parties in Interest’s Cross-Petition will be filed concurrently with the Petitioner’s Reply in Support of Petition for Extraordinary Writ Relief (i.e., September 17, 2020), unless this Court issues an Order directing an Answer to the Cross-Petition, in which case the Parties stipulate that the Petitioner/Cross-

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<sup>1</sup> The whereabouts of Real Party in Interest David E. Lujan are not known. He has not participated in this action and is not represented by counsel. Therefore, this Stipulation is made solely by the Petitioner and Real Party in Interest, Aaron M. Morgan.

1 Respondent shall have a 30-day extension of time to separately file the Answer  
2 to the Cross-Petition.

3 This appeal is not a child custody, visitation, or capital case.

4 The Parties stipulate and agree that this extension of time is necessary to  
5 accommodate the hardships imposed by the COVID-19 pandemic. Due to the  
6 recent surge in the number of cases in Clark County, counsel for the Petitioner  
7 are working from home. Sarah Harmon and Andrea Champion are the two  
8 attorneys primarily responsible for drafting and filing the Petitioner's Reply in  
9 support of the Writ Petition. Ms. Harmon is the primary caregiver for two  
10 elderly parents while she is working from home. Similarly, Ms. Champion is  
11 the mother of two small children and is also their primary caregiver while she  
12 works from home. Because of the unusual circumstances and hardships  
13 imposed by COVID-19, the Parties believe that extraordinary and compelling  
14 circumstances exist for extending the deadline for the Reply to the Writ Petition

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45 days. The Parties further believe that because of this extended continuance,  
the Petitioner will not need to seek additional continuances.

DATED this 28<sup>th</sup> day of July, 2020.

DATED this 28<sup>th</sup> day of July, 2020.

BAILEY ♦ KENNEDY

CLAGGETT & SYKES LAW FIRM

By: /s/ Sarah E. Harmon

By: /s/ Micah S. Echols

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-and-

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*Interest/Cross-Petitioner Aaron*  
*M. Morgan*

**CERTIFICATE OF SERVICE**

I certify that I am an employee of BAILEY❖KENNEDY and that on the 28<sup>th</sup> day of July, 2020, service of the foregoing **STIPULATION FOR EXTENSION OF TIME TO FILE PETITIONER'S REPLY IN SUPPORT OF PETITION FOR EXTRAORDINARY WRIT RELIEF AND ANSWER TO CROSS-PETITION FOR WRIT OF MANDAMUS OR PROHIBITION** was made by electronic service through the Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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**VIA U.S. MAIL:**

*Real Party in Interest*

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**VIA E-MAIL:**

*Respondent*

HONORABLE LINDA MARIE BELL  
**EIGHTH JUDICIAL DISTRICT**  
**COURT OF THE STATE OF**  
**NEVADA, IN AND FOR THE**  
**COUNTY OF CLARK**  
Department VII  
200 Lewis Avenue  
Las Vegas, Nevada 89155

/s/ Angelique Mattox  
Employee of BAILEY ♦ KENNEDY