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Attorneys for Petitioner,

Aaron M. Morgan

IN THE SUPREME COURT OF THE STATE OF NEVADA

AARON M. MORGAN,

Petitioner,

v.

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

Respondents,

Case No.: 81975

MOTION FOR EXTENSION OF
TIME TO FILE
PETITIONER'S REPLY IN
SUPPORT OF PETITION FOR
WRIT OF MANDAMUS
(Third Request)

and
HARVEST MANAGEMENT SUB LLC;
AND DAVID E. LUJAN,

Real Parties in Interest.

MOTION FOR EXTENSION OF TIME TO FILE
PETITIONER’S REPLY IN SUPPORT OF PETITION FOR
WRIT OF MANDAMUS
(Third Request)

Petitioner, Aaron M. Morgan (“Morgan”), by and through his counsel of record, Richard Harris Law Firm; and Claggett & Sykes Law Firm, hereby moves this Honorable Court pursuant to NRAP 26(1) for an extension of three days to file Morgan’s reply in support of petition for writ of mandamus.

Morgan’s reply was originally due February 10, 2021. This Court previously granted a first extension of time to March 12, 2021. The Court also granted a second extension of time to March 19, 2021. No request for addition time has been denied or denied in part. If this Court grants this request for an extension of three days, Morgan’s reply will be due Monday, March 22, 2021.

Good cause exists for allowing Morgan to extend the filing deadline for his reply until March 22, 2021:

Mr. Echols is currently involved in a jury trial in the Eighth Judicial District Court for the Plaintiff, which began jury selection on March 18, 2021. The case is *Giacalone v. MedicWest Ambulance, Inc.*, Case No. A-15-714139-C. His role in the case has included preparing the jury instructions, verdict forms, and trial briefs. The presiding Judge, the Honorable Jacqueline Bluth, asked the parties in a hearing earlier this month to have these items prepared by the start of trial. At the time of this hearing, Plaintiff estimated that it would have 5 or 6 trial briefs. However, due to numerous issues that arose this week with continuing discovery and objections to proposed jury instructions, the number of trial briefs rose to 9, which were all filed this week. Mr. Echols alone was responsible for the preparation of these trial briefs.

Despite this unexpected flow of work during this week, Mr. Echols has diligently worked on the reply brief for this case and is near completion. Yet, he still needs three additional days, or one judicial day, to finalize the brief.

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For the foregoing reasons, Morgan respectfully requests a three-day extension of time until March 22, 2021, within which to file and serve his reply in support of petition for writ of mandamus.

Dated this 19th day of March 2021.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols
Micah S. Echols, Esq.
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4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107
Attorneys for Petitioner,
Aaron M. Morgan

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE PETITIONER'S REPLY IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS (Third Request)** with the Nevada Supreme Court on the 19th day March 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Bryan A. Boyack (Richard Harris Law Firm)
Benjamin P. Cloward (Richard Harris Law Firm)
Andrea M. Champion (Bailey Kennedy)
Sarah E. Harmon (Bailey Kennedy)
Dennis L. Kennedy (Bailey Kennedy)

I further certify that the foregoing document was emailed to the following:

Honorable Linda Marie Bell, District Court Judge
Eighth Judicial District Court, Department 7
dept07lc@clarkcountycourts.us

I further certify that the foregoing document was mailed via U.S. Mail to the following:

David E. Lujan
651 McKnight Street, Apt. 16
Las Vegas, Nevada 89501

/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm