

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

**FILED**

MAR 24 2014

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT

BY DEPUTY CLERK

2  
3 NEVADA POLICY RESEARCH  
4 INSTITUTE, INC.,

5 Appellant,

6 vs.

7 CLARK COUNTY SCHOOL  
8 DISTRICT, A POLITICAL  
9 SUBDIVISION OF THE STATE OF  
NEVADA, *et al.*

10 Respondent.

Supreme Court Case No.: 64040

District Court Case No.:  
A-13-679114-C

11  
12 **OPPOSITION TO RESPONDENT'S SECOND MOTION FOR AN**  
13 **EXTENSION OF TIME TO FILE RESPONDENT'S ANSWERING BRIEF**

14 Pursuant to NRAP 27(a)(3)(A), Appellant hereby opposes another extension  
15 of time for Respondent to file an Answer Brief in this matter.

16  
17 Appellant timely filed its Opening Brief on January 16<sup>th</sup>, 2014, after which,  
18 on or about January 23<sup>rd</sup>, 2014, *amicus* ACLU OF NEVADA served Respondent  
19 with its brief in support of Appellant. In the eleventh hour, Clark County School  
20 District ("CCSD") again requests that this court now allow CCSD to further delay  
21 its compliance with the Public Records Act.

22 Since at least June 2012, under the Nevada Public Records Act, NRS  
23 239.001 *et seq.*, Respondent has unlawfully withheld from Appellant, the public  
24 records that are the subject matter of this lawsuit. Respondent, of course, has a long  
25 history of non-compliance with this statute – not just in this case but as a matter of  
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1 standard operating procedure. *See* Appellant's Opening Brief p.9 and JA 0062-  
2 0076. Respondent's Motion for yet another extension of time is little more than a  
3 continuation of that scofflaw practice that has become commonplace for CCSD.  
4

5 First, three attorneys from Respondent's firm have entered an appearance in  
6 this case – a firm boasting no less than 40 attorneys in its Las Vegas Office alone.  
7


8 Second, cases brought pursuant to the Nevada Public Records Act are to be  
9 given expedited treatment by the courts. NRS 239.011.  
10

11 Lastly, Respondent's case is completely without legal merit. Although  
12 apparent before, this is especially clear given this Court's recent holding in *Public*  
13 *Employees' Retirement System of Nevada v. Reno Newspapers, Inc.* No. 60129  
14 (November 14, 2013). *See* Appellant's Opening Brief, pp. 11, 12, 15, and 20.  
15

16 Respondent's motion is yet another attempt to delay or evade compliance  
17 with the statute – an evasion which this Court should not enable by granting further  
18 extensions.  
19

20 Respectfully submitted this 24<sup>th</sup> day of March, 2014.

21 **NPRI CENTER FOR JUSTICE**

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