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7 *Attorney for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and
on behalf of their minor child N.H.;
VERONICA BERRY individually and on
behalf of her minor child J.B.; RED AND
SHEILA FLORES individually and on behalf
of their minor child C.F.; JAOUAD AND
NAIMI BENJELLOUN, individually and on
behalf of their minor children N.B.1, N.B.2,
and N.B.3; KIMBERLY AND CHARLES
KING individually and on behalf of their
minor children L.K.1 and L.K.2; NEVADA
CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE
PUBLIC CHARTER SCHOOL
AUTHORITY, a political subdivision of the
State of Nevada, and PATRICK GAVIN, in
his official capacity as Director of the State
Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

**EX PARTE MOTION FOR ORDER
SHORTENING TIME ON MOTION
FOR LEAVE TO CONDUCT LIMITED
PREHEARING DISCOVERY**

COMES NOW, Plaintiffs, David & Carly Held individually and on behalf of their minor
child N.H.; Veronica Berry individually and on behalf of her minor child J.B.; Red and Sheila
Flores individually and on behalf of their minor child C.F.; Jaouad and Naimi Benjelloun,
individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; Kimberly and
Charles King individually and on behalf of their minor children L.K.1 and L.K.2; and Nevada

1 Connections Academy ("NCA" and collectively "Plaintiffs"), by and through their undersigned
2 counsel, Davis Graham & Stubbs LLP, and hereby submit this ex parte application for an order
3 shortening time. Plaintiffs seek an expedited briefing schedule on their Motion to Conduct
4 Limited Prehearing Discovery ("Motion"), filed concurrently herewith. This application is made
5 in good faith and based upon the Memorandum of Points and Authorities and all papers and
6 pleadings filed in this action.

7 MEMORANDUM OF POINTS AND AUTHORITIES

8 I. ARGUMENT

9 In conjunction with this ex parte motion for an order shortening time, Plaintiffs filed a
10 Motion to Conduct Limited Prehearing Discovery. Counsel for Defendants were provided
11 copies of this ex parte motion, the proposed order, and the Motion via hand delivery and email.

12 An expedited briefing schedule is required in this matter as the hearing on Plaintiffs'
13 Motion for Temporary Restraining Order/Preliminary Injunction was set by the Court on
14 November 15, 2016 for November 30, 2016. In order to prepare for the hearing and to
15 streamline the hearing process, Plaintiffs wish to conduct limited prehearing discovery in the
16 form of four depositions. Plaintiffs' counsel contacted Defendants' counsel about scheduling
17 depositions in preparation for the evidentiary hearing on November 30 but as of the time of this
18 writing, Plaintiffs have not heard back from Defendants' counsel regarding their request to take
19 these limited depositions.

20 In light of all the above, Plaintiffs respectfully request that any opposition brief be due by
21 November 17, 2016 by 5:00 PM, faxed or emailed to Plaintiffs' counsel of record, and any reply
22 brief be due by November 18, 2016 by 10:00 AM, faxed or emailed to Defendants' counsel of
23 record. Plaintiffs are proposing depositions be taken on November 22, 23 and 29, ahead of the
24 November 30th hearing.

26 II. CONCLUSION

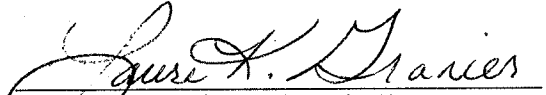
27 For the foregoing reasons, Plaintiffs requests that this Court enter an Order Shortening
28 Time, requiring any opposition brief to be filed by 5:00 PM on November 17, 2016 and any

1 reply brief to be filed by 10:00 AM on November 18, 2016.

2 Respectfully submitted this 16th day of November, 2016.

3 DAVIS GRAHAM & STUBBS LLP

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5 By:



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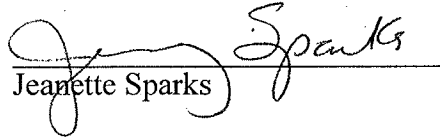
1 CERTIFICATE OF SERVICE

2 Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs
3 LLP and not a party to, nor interested in, the within action; that on November 16, 2016, a true
4 and correct copy of the foregoing document was enclosed in a sealed envelope, and served as
5 listed below:
6

7 Gregory D. Ott, Esq.
8 Deputy Attorney General
9 100 N. Carson Street
10 Carson City, NV 89701

11 *Attorneys for Defendants*

VIA HAND DELIVERY AND EMAIL

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13 Jeanette Sparks
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