1	<b>BEFORE THE STATE PUBLIC CHARTER SCHOOL AUTHORITY</b>
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3	STATE OF NEVADA In Re:
4 5	Nevada Connections Academy Notice of Closure or Possible Board Reconstitution ACADEMY'S MOTION FOR CONTINUANCE OF HEARING
6 7	Hearing Date: March 30, 2017 Hearing Time: 8:00 AM
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9 10	Nevada Connections Academy ("NCA"), by and through their undersigned counsel,
11	Davis Graham & Stubbs LLP, hereby requests a brief continuance of the hearing scheduled for
12	March 30, 2017, for the reasons stated in the Declaration of Laura K. Granier. Counsel for NCA
13	has a family medical emergency that prevents her from preparing for and attending the March 30
14	hearing. Therefore, NCA respectfully requests, at minimum, a three-week continuance of the
15	hearing to allow NCA's counsel to deal with this serious matter.
16	Respectfully submitted this 28 <sup>th</sup> day of March, 2017.
17	DAVIS GRAHAM & STUBBS LLP
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19	By: Jama Sand Laura K. Granier (NSB 7357)
20	Erica K. Nannini (NSB 13922) 50 W. Liberty Street, Suite 950
21	Reno, Nevada 89501 (775) 229-4219 (Telephone)
22	Attorneys for Nevada Connections Academy
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1	BEFORE THE STATE PUBLIC CHARTER SCHOOL AUTHORITY
2	STATE OF NEVADA
3 4 5 6 7	In Re: Nevada Connections Academy Notice of Closure or Possible Board Reconstitution <b>DECLARATION OF LAURA K.</b> <b>GRANIER IN SUPPORT OF NEVADA</b> <b>CONNECTIONS ACADEMY'S</b> <b>MOTION FOR CONTINUANCE OF</b> <b>HEARING</b>
8 9	I, Laura K. Granier, do certify under penalty of perjury as follows: 1. I am a partner with the law firm of Davis Graham & Stubbs LLP, counsel for
10 11	Nevada Connections Academy ("NCA"). I have personal knowledge of the facts stated herein,
12	and if called upon to testify as to the matters set forth herein, I would be competent to do so. I
13	make this declaration in support of the NCA's Motion for Continuance of Hearing ("Motion").
14 15	2. My mother has been ill for several months and has been in and out of the hospital.
15	Her condition worsened over the past month, and she was recently hospitalized again and then
17	sent to a rehabilitation hospital. Over the weekend, her condition deteriorated abruptly and she
18	was once again hospitalized. My mother's condition is extremely serious and we are making
19	end-of-life decisions and evaluating hospice care. Based on her current condition, I believe I
20	may only have a few more days with her, although the doctors cannot say with certainty.
21	3. It would be difficult for me to prepare for and attend the March 30 hearing as I am
22	the primary family caregiver for my mother and I have her power of attorney for these important
23	end-of-life decisions. I am also concerned that even if I were to attempt to proceed with the
24 25	hearing, her condition may deteriorate further after the hearing started, and we would all be a
25 26	more difficult position of having to stop the proceedings so that I could return to Reno. In
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28	addition, and more importantly, given that I do not know how much more time I will have with

my mother, I would like to spend as much time as possible with her during this critical and emotional time.

I hereby request that the March 30, 2017 hearing be postponed for a minimum of 4. three weeks. Although I am cognizant of the logistical difficulties this presents, I believe this is the best option not only for myself, but for my client and for the State, given the disruption that would occur should we attempt to proceed and then be forced to abruptly postpone the hearing due to a downturn in my mother's medical condition.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct and was executed this 28th day of March, 2017, in Reno, Nevada.

RAK. GRANIER

1	CERTIFICATE OF SERVICE
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3	Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs
4	LLP and not a party to, nor interested in, the within action; that on March 28, 2017, a true and
5	correct copy of the foregoing document was served as listed below:
6	Gregory D. Ott, Esq. <u>VIA EMAIL</u>
7	Deputy Attorney General 100 N. Carson Street Carson City, NV 89701
8	Robert A. Whitney, Esq. <u>VIA EMAIL</u>
9	Deputy Attorney General 100 N. Carson Street Carson City, NV 89701
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11	Attorneys for State Public Charter School Authority
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13	Jeanette Sparks
14	Jeanette Sparks
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