

1 **BEFORE THE STATE PUBLIC CHARTER SCHOOL AUTHORITY**

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3 In re:

4 NEVADA CONNECTIONS ACADEMY

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) Hearing Date: March 30, 2017

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) Time: 8:00 A.M.
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8 **STATE PUBLIC CHARTER SCHOOL AUTHORITY STAFF’S**
9 **NON-OPPOSITION TO MOTION TO CONTINUE HEARING**

10 The State Public Charter School Authority Staff (“Staff”), through their counsel,
11 Adam Paul Laxalt, Attorney General of the State of Nevada, and Gregory D. Ott, Senior
12 Deputy Attorney General, submit this Non-Opposition to Motion to Continue Hearing.

13 Do to the abbreviated briefing schedule, Staff has not had the opportunity to fully
14 review the motion for continuance, but bases its non-opposition on the understanding
15 that Nevada Connections Academy’s (“NCA”) request for an extension is accompanied by
16 a waiver of the requirement that a hearing be held within 90 days as required by NRS
17 388A.330(3). Based on that understanding and the representations contained in Ms.
18 Granier’s email request, Staff does not oppose the continuance request and would work
19 with the Authority Board to schedule an acceptable date.

20 However, Staff notes that it has not inquired as to the availability of the Authority
21 Board members who serve voluntarily and have made significant scheduling efforts to be
22 available for a three day hearing. The following list of services, facilities and goods have
23 been retained in preparation for the hearing: travel, lodging, court reporter, facility
24 rental, security, restroom rental for alternate location at an approximate cost of
25 \$10,000.00 so that the Authority can be apprised of efforts to prepare for this meeting.

26 Staff remains ready and willing and able to go forward on March 30, 2017 and, in
27 the event that NCA’s request for a continuance is denied, would be willing to work with
28 counsel for NCA to consider any stipulations to expedite the hearing or make

1 accommodations to minimize the inconvenience to counsel (for instance, if Counsel for
2 NCA is unable to travel to Las Vegas and wishes to argue from Carson City but is
3 concerned about being at a disadvantage, counsel for Staff would agree to argue from
4 Carson City).

5 DATED this 28th day of March, 2017.

6 ADAM PAUL LAXALT
7 Attorney General

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9 By: 
10 GREGORY D. OTT
11 Senior Deputy Attorney General

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CERTIFICATE OF SERVICE

It is hereby certified that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 28th day of March, 2017 a true and correct copy of the foregoing STATE PUBLIC CHARTER SCHOOL AUTHORITY'S NON-OPPOSITION TO MOTION TO CONTINUE HEARING was sent by E-mail only to the following:

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Marissa Kuckhoff, Legal Secretary II