

STATE BAR OF NEVADA

December 31, 2024

United States Supreme Court
Attn: Clerk
1 First Street, NE
Washington, D.C. 20543



RE: *Thomas v. State Bar of Nevada*, Docket No. 24-411
Second Request for Extension of Time to File Opposition to
Petition for Writ of Certiorari

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Dear Clerk of the Court:

The State Bar of Nevada respectfully requests an extension to and including January 6, 2024 to file its corrected Response in Opposition to the Petition for Writ of Certiorari filed by Jeffrey G. Thomas, Esq. in Docket No. 24-411.

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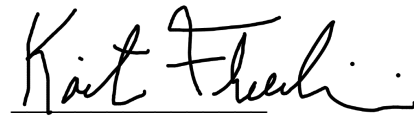
On or about November 5, 2024, the State Bar of Nevada received a 30-day extension of time to file the Response to afford counsel time to be admitted to this Court.

On December 12, 2024, the State Bar of Nevada timely filed its Response in Opposition to Writ of Certiorari. However, the State Bar inadvertently failed to properly format the appendix and the page numbering of the brief. The Clerk of the Court informed the State Bar on December 17, 2024 that the formatting errors prevented the filing of the Response. The Clerk of the Court graciously informed the State Bar on December 19, 2024 that an extension of time to re-file the Response would not be automatically granted because of the initially granted extension of time and it was necessary to file a request for an additional extension of time.

There is strong support for the policy preference of deciding matters on their merits. *See e.g., Duralar Techs. Ltd. Liab. Co. v. Plasma Coating Techs., Inc.*, 848 F. App'x 252, 255 (9th Cir. 2021) (citations omitted); *Suso v. Clark Cty. Sch. Dist.*, No. 2:23-cv-01707-APG-VCF, 2023 U.S. Dist. LEXIS 220975 (D. Nev. Dec. 11, 2023) (citations omitted); and *Huckabay Props. v. NC Auto Parts, Ltd. Liab. Co.*, 130 Nev. 196, 322 P.3d 429 (2014). Therefore, the State Bar requests up to

and including January 6, 2025 to resubmit the re-formatted Response, with the pagination and appendix documents corrected and the counsel of record properly identified, so that the Court may consider the substance of the State Bar's response when deciding whether to grant the Petitioner's request. The request for an extension of time is longer than would ordinarily be requested because of the intervening holidays between December 19 and January 6, but only includes eight business days.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kait Flocchini", with a horizontal line underneath.

Rachel Flocchini, Esq.
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