

FILED
July 24, 2026
State of Nevada
E.M.R.B.
3:53 p.m.

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Before the State of Nevada
Government Employee-Management
Relations Board

CLARK COUNTY PROSECUTORS
ASSOCIATION,

Complainant,

v.

CLARK COUNTY,

Respondent.

Case No. 2024-019

**JOINT REQUEST FOR
POSTPONEMENT AND WAIVER OF
180-DAY HEARING PERIOD**

JOINT REQUEST FOR POSTPONEMENT AND WAIVER

Complainant, Clark County Prosecutors Association (“CCPA”) and Respondent Clark County (“County”), by and through their respective counsel, jointly request pursuant to NAC 288.090 that the Board postpone the hearing presently scheduled for August 5 and August 6, 2026, and reschedule the hearing in its entirety for mutually available dates in September 2026 and

JOINT REQUEST FOR POSTPONEMENT AND WAIVER OF 180-DAY HEARING PERIOD

1 additionally waive the 180-day period for hearing the Complaint. This request is based upon the
2 following:

- 3 1. The Board recently advised the parties that the second scheduled hearing day must be
4 shortened and requested the parties' positions concerning the addition of a third
5 hearing day in late August 2026.
- 6 2. Counsel for the parties conferred regarding the Board's scheduling inquiry and agreed
7 that rather than divide the evidentiary hearing among nonconsecutive dates, the parties
8 agree that postponing and rescheduling the hearing in its entirety would promote the
9 order and efficient presentation of the evidence.
- 10 3. The parties have also begun discussing potential resolution of this matter and a brief
11 postponement would provide the parties with additional time to determine whether the
12 matter can be resolved without a hearing or, alternatively, whether the issues requiring
13 hearing can be further narrowed.
- 14 4. The parties are unavailable from August 21 through August 25, 2026, because of a
15 preexisting conflict. The parties therefore request that the hearing be rescheduled for
16 mutually available dates in September 2026, subject to the Board's availability.
- 17 5. The Board ordered this matter to be scheduled for hearing on March 31, 2026. The
18 180-day period for hearing the Complaint therefore expires on September 28, 2026.
- 19 6. Pursuant to NAC 288.290(2), the parties jointly request that the Commissioner waive
20 the 180-day period for hearing the Complaint so the Board may reschedule and
21 complete the hearing on mutually available dates in September 2026, including dates
22 after September 28, 2026, if necessary.
- 23 7. This request is made jointly, in good faith, and not for purposes of unnecessary delay.

24 WHEREFORE, the parties respectfully request that the Board: (1) vacate the hearing dates
25 presently set for August 5 and August 6, 2026; (2) reschedule the hearing in its entirety for
26

1 mutually available dates in September 2026; (3) grant the parties' joint request to waive the 180-
2 day period for hearing the Complaint pursuant to NAC 288.290(2); and (4) grant such other relief
3 as the Board deems appropriate.

4 Date: July 24, 2026

5
6 **REESE RING VELTO, PLLC**

7
8 /s/ Paul Cotsonis

9 PAUL COTSONIS, ESQ

10 NV BAR NO. 8786

11 NATHAN R. RING, ESQ.

12 NV BAR NO. 12078

13 *Counsel for Complainant CCPA*

/s/ Allison Kheel

ALLISON L. KHEEL, ESQ.

Nevada Bar No. 12986

MARK J. RICCIARDI, ESQ

Nevada Bar No. 3141

Counsel for Respondent Clark County

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on July 24, 2026, I served a true and correct copy have mailed in
16 portable document format as required by NAC 288.070(d)(3), a true and correct copy of the
17 foregoing **JOINT REQUEST FOR POSTPONEMENT AND WAIVER OF 180-DAY**
18 **HEARING PERIOD** by electronic means as addressed below and sent certified mail pursuant
19 to NAC 288.200(2). I also have filed the document with the Nevada Government Employee-
20 Management Relations Board via its email address at emrb@business.nv.gov:

21 Allison Kheel, Esq
22 FISHER & PHILLIPS LLP
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24 Las Vegas, NV 89101
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27 *Attorney for Clark County*

/s/ Michelle Wade

An employee of REESE RING VELTO

28 **JOINT REQUEST FOR POSTPONEMENT AND WAIVER OF 180-DAY HEARING PERIOD**