

IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA JOHNSON,

Appellant,

v.

WELLS FARGO BANK, NATIONAL  
ASSOCIATION,

Respondent.

DOCKET NO. 66094  
Electronically Filed  
District Court of the 1st Judicial District  
July 22, 2015 3:45 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court  
**MOTION FOR EXTENSION  
OF TIME TO FILE  
ANSWERING BRIEF**

**[SECOND REQUEST]**

Pursuant to NRAP 31(b)(3), Respondent respectfully requests a three-week extension to file its answering brief, up to and including August 17, 2015. The brief is currently due on July 27, 2015. This request for extension is the second such request. The parties previously filed a stipulation, pursuant to NRAP 31(b)(2), to extend the answering brief deadline 30 days from June 25, 2015, which date was the due date occasioned by Appellant's earlier request to extend the deadline for her opening brief.

Good cause exists to grant the additional short extension as follows:

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1. Respondent’s counsel discussed the instant motion with Appellant’s counsel, Michael K. Wall, Esq., on July 21, 2015 who authorized Respondent’s counsel to represent to the Court that Appellant has no opposition to the extension.

2. The recent departure of personnel in Respondent’s counsel’s office has strained resources, and has caused the re-direction of efforts in other matters competing for Respondent counsel’s time and attention

3. Respondent, a large national banking institution, requires in-house vetting of all court submissions, particularly appellate filings. Respondent has not had an opportunity to vet the answering brief.

3. Respondent believes and avers that the additional extension serves the interests of the parties and the Court in insuring that all relevant matters properly examined and placed before the Court in its eventual review of the case.

5. Additional extensions of time to file the answering brief were not anticipated prior; however, extenuating circumstances have prompted the additional request for time.

6. There is no known cause of prejudice to any party by the extension, and there are no known matters of urgency in the case.


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In view of the foregoing, Respondent respectfully requests the Court grant of  
an extension up to and including August 17, 2015 to file its answering brief.

DATED: July 22, 2015

SMITH LARSEN & WIXOM

By:   
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Las Vegas, Nevada 89134  
Attorneys for Respondent

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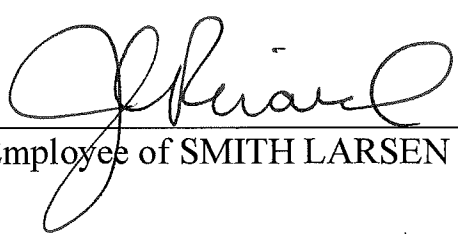
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 22, 2015, I served the following document(s):

**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF  
[SECOND REQUEST]**

- ☒ **BY ELECTRONIC TRANSMISSION:** by transmitting the document to the parties identified below via the Supreme Court E-Flex e-filing system pursuant to NEFCR 9.
- ☐ **BY MAIL:** by placing the documents(s) listed above in a sealed envelope, postage prepaid, in the U.S. Mail at Las Vegas, Nevada, addressed as set forth below.
- ☐ **BY FAX:** by transmitting the document(s) listed above via telefacsimile to the fax number(s) set forth below. A printed transmission record is attached to the file copy of this document(s).

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An Employee of SMITH LARSEN & WIXOM