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Tracie K. Lindeman
Clerk of Supreme Court

6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 BANK OF NEVADA, A Nevada Banking
8 Corporation,

Supreme Court Case No.: 66568

9 Appellant,

D.C. Case No.: A-680012

10 vs.

11 MURRAY PETERSEN, an individual,

12 Respondent.

13 **MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF**

14 Respondent, Murray Petersen, moves the Court, pursuant to the provisions of N.R.A.P.
15 Rule 31 (a)(1), for an additional thirty days to file his Answering Brief. The Answering Brief
16 is currently due on March 9, 2015. This is Respondent's first request for an extension of time.

17 N.R.A.P. Rule 26(d) allows for one extension as a matter of course and for a second
18 extension upon good cause shown or an unforeseen emergency.

19 Respondent's attorney is a solo practitioner and has just recently been released for the
20 hospital where he was treated for sepsis and pneumonia. Additionally he is under a two week
21 course of clinic administered intravenous antibiotics which consumes his mornings.
22 Accordingly, undersigned has been unable to prepare the Answering Brief before its current
23 deadline especially with other matters which must be attended to.

24 Undersigned has contacted opposing counsel Bradley Austin, Esq. to request
25 additional time to file the Answering Brief. Opposing counsel has agreed to a 30 day
26 extension.

27 ...

1 Accordingly, it is requested that Respondent be given until April 8, 2015 to file his Answering
2 Brief.

3 Respectfully submitted this 5th day of March 2015.

4 THE MCKNIGHT LAW FIRM, PLLC

5
6 By: /s/ Richard McKnight
7 Richard McKnight, Esq.
8 Nevada State Bar No. 1313
9 528 S. Casino Center Blvd., #335
10 Las Vegas, Nevada 89101
11 Attorneys for Respondent Murray
12 Petersen

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DECLARATION OF RICHARD MCKNIGHT

I declare under penalty of perjury that the following is true and correct:

1. I am an attorney with The McKnight Law Firm, PLLC, attorney for
Respondent in the above-entitled appeal and I make this declaration upon personal knowledge
and am competent to testify to the things stated herein.

2. I am the attorney working on this appeal.

3. I was recently hospitalized for pneumonia and sepsis and was released on
February 23, 2015.

4. Since release from the hospital I must go to an infusion center each morning
for antibiotics which are expected to last at least until Monday, March 9, 2015. These sessions
consume two hours each day at a minimum.

5. I contacted Bradley Austin's office with regard to the extension and was told
there was no objection to same.

6. This is the Respondent's first request for extension.

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7. I request an extension in this matter to file the Answering Brief to April 8, 2015.

Further your declarant saith not.

Richard McKnight

CERTIFICATE OF MAILING

I hereby certify that on this 5th day of March 2015, I mailed first-class, postage paid, a true and correct copy of the foregoing MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF to the following:

Michael D. Stein, Esq.
Bradley Austin, Esq.
SNELL & WILMER, LLP
3883 Howard Hughes Pkwy., #1100
Las Vegas, NV 89169
Attorneys for Bank of Nevada

/s/ Gwen Kopang
An Employee of The McKnight Law Firm, PLLC