

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

2           O.P.H. OF LAS VEGAS, INC.,

3                                   Appellant,

4           vs.

5           OREGON MUTUAL INSURANCE  
6           COMPANY, DAVE SANDIN, AND  
7           SANDIN & CO.,

8                                   Respondents.

                                  Electronically Filed  
No.: 68543   Feb 05 2016 08:48 a.m.  
DC No.: A-17-02148   T. Lindeman  
                                  Clerk of Supreme Court

9                   **MOTION FOR**  
10                  **EXTENSION TO FILE**  
11                  **APPELLANT'S OPENING**  
12                  **BRIEF AND APPENDIX**  
13                  **[SECOND REQUEST]**

14                   **MOTION FOR EXTENSION TO FILE APPELLANT'S OPENING**  
15                   **BRIEF AND APPENDIX [SECOND REQUEST]**

16           COMES NOW Appellant O.P.H. of Las Vegas, Inc. hereby respectfully  
17           requests forty-five (45) days, until April 11, 2016, to file its Opening Brief  
18           and Appendix. Appellant's Opening Brief and Appendix is currently due on  
19           February 24, 2016. This is O.P.H. of Las Vegas, Inc.'s second request for an  
20           extension in this matter. This motion is based on the following memorandum  
21           and all papers and pleadings on file herein.

22           Undersigned counsel has conferred with opposing counsel about this  
23           request. Counsel for Respondent Oregon Mutual Insurance Company  
24           represented that they did not oppose this request.<sup>1</sup> Undersigned counsel  
25           

26  
27  
28           <sup>1</sup> Counsel for Respondents Dave Sandin and Sandin & Co. did not agree to the  
          same professional courtesy.

1 appreciates the professional courtesy shown by counsel for Oregon Mutual  
2 Insurance Company.

3 Respectfully submitted this 4th day of February, 2016.  
4

5 /s/ Margaret A. McLetchie  
6 MARGARET A. MCLETCHE, Nevada Bar No. 10931  
7 **MCLETCHE SHELL LLC**  
8 701 East Bridger Ave., Suite 520  
9 Las Vegas, Nevada 89101  
10 Telephone: (702) 728-5300  
11 Facsimile: (702) 425-8220  
12 Email: maggie@nvlitigation.com  
13 *Attorney for Appellant, O.P.H. of Las Vegas, Inc.*  
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**MEMORANDUM**

I, Margaret A. McLetchie, am the attorney of record in the above-captioned case.

This Court may “[f]or good cause” extend the time “prescribed by the [Nev. R. App. P.] or by its order to perform any act, or may permit an act to be done after that time expires.” NRAP 26(b)(1)(A). Here, there is “good cause” because the undersigned counsel needs time to comply with her ethical duties to adequately research the unique issues presented in this case, and to ensure this Court receives all of the relevant material and authorities to aid in its consideration of this matter. Further, the undersigned counsel requires additional time for personal reasons that were not foreseen<sup>2</sup>.

The Opening Brief and Appendix are currently due February 24, 2016. An extension is necessary in this case for the aforementioned circumstances and to ensure proper briefing. Appellant thus respectfully requests an extension of forty-five (45) days for the Opening Brief and Appendix, which would move that deadline from February 24, 2016 to April 11, 2016.

This extension is sought in good faith and not for the purpose of delay, this request is not made for the purposes of delay, but in the interests of

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<sup>2</sup> The undersigned wishes to visit a close family member who is struggling with a terminal illness, and also requires time to deal with a serious personal health issue.

1 effectively representing the interests of O.P.H. of Las Vegas, Inc.

2 The undersigned declares under penalty of perjury the factual  
3 representations set forth in the foregoing memorandum are true and correct.  
4

5 Respectfully submitted this 4th day of February, 2016.

6 /s/ Margaret A. McLetchie

7 MARGARET A. MCLETCHE, Nevada Bar No. 10931

8 **MCLETCHE SHELL LLC**

9 701 East Bridger Ave., Suite 520

10 Las Vegas, Nevada 89101

11 Telephone: (702) 728-5300

12 Facsimile: (702) 425-8220

13 Email: maggie@nvlitigation.com

14 *Attorney for Appellant, O.P.H. of Las Vegas, Inc.*  
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