IN THE SUPREME COURT OF THE STATE OF NEVADA

1 2 O.P.H. OF LAS VEGAS, INC., 3 Appellant, Electronically Filed 4 No.: 68543 Feb 05 2016 08:48 a.m. DC No.: A-127-657214548. Lindeman VS. 5 Clerk of Supreme Court 6 OREGON MUTUAL INSURANCE **MOTION FOR EXTENSION TO FILE** COMPANY, DAVE SANDIN, AND 7 SANDIN & CO., APPELLANT'S OPENING 8 **BRIEF AND APPENDIX** 9 Respondents. [SECOND REQUEST] 10 11 MOTION FOR EXTENSION TO FILE APPELLANT'S OPENING 12 **BRIEF AND APPENDIX [SECOND REQUEST]** 13 COMES NOW Appellant O.P.H. of Las Vegas, Inc. hereby respectfully 14 15 requests forty-five (45) days, until April 11, 2016, to file its Opening Brief 16 and Appendix. Appellant's Opening Brief and Appendix is currently due on 17 18 February 24, 2016. This is O.P.H. of Las Vegas, Inc.'s second request for an 19 extension in this matter. This motion is based on the following memorandum 20 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. Undersigned counsel 26 27

¹ 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.
5	/s/ Margaret A. McLetchie
6	MARGARET A. MCLETCHIE, Nevada Bar No. 10931 MCLETCHIE SHELL LLC
7	701 East Bridger Ave., Suite 520 Las Vegas, Nevada 89101
8	Telephone: (702) 728-5300
9	Facsimile: (702) 425-8220 Email: maggie@nvlitigation.com
10	Attorney for Appellant, O.P.H. of Las Vegas, Inc.
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
2223	
24	
25	
26	
27	
28	
_0	

MEMORANDUM

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.

I, Margaret A. McLetchie, am the attorney of record in the abovecaptioned 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 foreseen².

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

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.
5	Respectfully submitted this 4th day of February, 2016.
6	/s/ Margaret A. McLetchie
7	MARGARET A. MCLETCHIE, Nevada Bar No. 10931
8	MCLETCHIE SHELL LLC 701 East Bridger Ave., Suite 520
9	Las Vegas, Nevada 89101
10	Telephone: (702) 728-5300
11	Facsimile: (702) 425-8220 Email: maggie@nvlitigation.com
12	Attorney for Appellant, O.P.H. of Las Vegas, Inc.
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

CERTIFICATE OF SERVICE

2	I certify that I am an employee of McLetchie Shell LLC and that on this
3	4th day of February, 2016 the MOTION FOR EXTENSION TO FILE
4	The day of February, 2010 the Motion For Extrement 10 Tibe
5	APPELLANT'S OPENING BRIEF AND APPENDIX [SECOND
6	REQUEST] was filed electronically with the Clerk of the Nevada Supreme
7	
8	Court, and therefore electronic service was made in accordance with the
9	Master Service List as follows:
10	Patricia M. Lee, Esq. Robert W. Freeman, Esq.
11	Michael S. Kelley, Esq. Priscilla L. O'Briant, Esq.
12	Michael K. Wall, Esq. LEWIS BRISBOIS
13	HUTCHISON & STEFFEN LLC BISGAARD & SMITH LLP
14	10080 West Alta Drive, Suite 200 6385 S. Rainbow Blvd., Suite 600 Las Vegas, NV 89145 Las Vegas, NV 89118
15	I fruther centify that an this 4th day of Echanomy 2016, a tays and compact
16	I further certify that on this 4th day of February, 2016, a true and correct
17	copy of the foregoing MOTION FOR EXTENSION TO FILE
18	APPELLANT'S OPENING BRIEF AND APPENDIX [SECOND
19	REQUEST] was sent to Settlement Judge, pursuant to NRAP 16(a)(3) via
20	20
21	postage fully prepaid United States Mail to the following:
22	Salvatore Gugino
23	9950 W. Cheyenne Ave.
24	Las Vegas, NV 89129
25	/s/ Pharan Burchfield
26	Employee, McLetchie Shell LLC
27	
28	