Case No. 70498

In the Supreme Court of Nevada

ALBERT THOMAS, et al.,

Appellants,

vs.

MEI-GSR HOLDINGS, LLC,

Respondent.

Electronically Filed Mar 16 2018 11:58 a.m. Elizabeth A. Brown Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REHEARING

Respondent MEI-GSR Holdings, LLC requests 31 days, through April 16, 2018, to file its petition for rehearing. NRAP 31(b)(3). This is the first such request. Without an extension, the petition would be due March 16, 2018.

Additional time is necessary for several reasons. First, counsel needed time to discuss the panel's decision with their client and decide whether to move for rehearing. Second, counsel had to evaluate the impact of a decision from the *en banc* Court issued just three days before in *Aliante Master Ass'n v. Prem Deferred Trust*, No. 71026. Although counsel have completed a draft of the argument for rehearing, the requested extension will allow respondent to synthesize this decision and succinctly present the issue for rehearing. Third, the attorney respon-

sible for drafting the answering brief on appeal is on family leave.

Fourth, while counsel's caseload would not justify an extension without other reasons, over the last few weeks appellate counsel have assisted several *pro bono* clients with briefs in this Court and been involved in

Dated this 16th day of March, 2018.

three overlapping trials.

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CERTIFICATE OF SERVICE

I certify that on March 16, 2018, I submitted the foregoing "Motion for Extension of Time to File Petition for Rehearing" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

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