IN THE SUPREME COURT OF THE STATE OF NEVADA

JAMES NALDER, GUARDIAN AD LITEM ON BEHALF OF CHEYANNE NALDER; AND GARY LEWIS, INDIVIDUALLY,

Case No. 70504

Electronically Filed Sep 14 2016 04:29 p.m. Tracie K. Lindeman Clerk of Supreme Court

Appellants,

vs.

UNITED AUTOMOBILE INSURANCE COMPANY,

Respondent.

STIPULATION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND AMEND BRIEFING SCHEDULE REGARDING CERTIFIED QUESTION OF LAW

Respondent, UNITED AUTOMOBILE INSURANCE COMPANY and Appellants, JAMES NALDER, GUARDIAN AD LITEM ON BEHALF OF CHEYANNE NALDER and GARY LEWIS, INDIVIDUALLY, hereby stipulate to extend the time for Appellants to file their Opening Brief, Respondents to file their Response Brief and, for Appellants' to file their Reply brief Regarding Certified Question of Law from the United States Ninth Circuit Court of Appeals by forty-nine (49) days.

The reason for this extension is due to Respondent's new counsel in this matter. This Court granted Thomas Scott and Scott Cole's Motion to Associate on

September 7, 2016. Further, the parties are seeking to conduct a private mediation. A forty-nine (49) day extension will allow the parties to mediate and, also allow new counsel to fully brief the legal issues outlined in the certified question of law from the United States Ninth Circuit of Appeals. Respondent has graciously agreed to allow Appellants a further forty-nine (49) day extension to file their Opening Brief Regarding Certified Question of Law, up to and including November 7, 2016. Further, Appellants' have graciously agreed to allow Respondents 60 days from November 7, 2016 to file and serve an answering brief or, by January 6, 2017. The parties have further agreed that the Appellants shall then have 27 days from January 6, 2016 or, until February 2, 2017, to file and serve any reply brief.

Therefore, Respondent respectfully request this Court grant their stipulation.

Dated this day of August, 2016.

Dated this day of August, 2016.

EGLET PRINCE

<u>/s/ Dennis M. Prince</u> DENNIS M. PRINCE, ESQ. Nevada Bar No. 5092 400 South Seventh Street, Suite 400 Las Vegas, Nevada 89101 *Attorneys for Appellants*

ATKIN WINNER & SHERROD

<u>/s/ Matthew Douglas</u> MATTHEW DOUGLAS, ESQ. Nevada Bar No. 11371 1117 S. Rancho Drive Las Vegas, Nevada 89102 *Attorneys for Respondent*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Nevada

Supreme Court on the 14th day of September, 2016. Electronic service of the foregoing

STIPULATION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND

AMEND THE BRIEFING SCHEDULE REGARDING CERTIFIED QUESTION

OF LAW shall be made in accordance with the Master Service List as follows:

Thomas Christensen, Esq. CHRISTENSEN LAW OFFICES, LLC 1000 S. Valley View Blvd. Las Vegas, Nevada 89107 Attorney for Appellants

DENNIS M. PRINCE, ESQ. EGLET PRINCE Nevada Bar No. 5092 400 South Seventh Street, Suite 400 Las Vegas, Nevada 89101 *Attorneys for Appellants*

> <u>/s/ Victoria Hall</u> An Employee of Atkin Winner and Sherrod