

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

IN THE MATTER OF: THE W.N.
CONNELL AND MARJORIE T.
CONNELL LIVING TRUST, DATED
MAY 18, 1972,

JACQUELINE M. MONTOYA; AND
KATHRYN A. BOUVIER,

Appellants,

vs.

ELEANOR C. AHERN A/K/A
ELEANOR CONNELL HARTMAN
AHERN,

Respondent.

Electronically Filed
Supreme Court No.: 71577
June 12 2017 09:18 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
District Court Case No.:
P-09-066425-T

Appeal from the Eighth Judicial
District Court, The Honorable Gloria
Sturman Presiding

STIPULATION FOR EXTENSION OF TIME
TO FILE ANSWERING BRIEF

BROWNSTEIN HYATT FARBER SCHRECK, LLP

Kirk B. Lenhard, Esq., NV Bar No. 1437

klenhard@bhfs.com

100 North City Parkway, Suite 1600

Las Vegas, NV 89106-4614

Telephone: 702.382.2101

Facsimile: 702.382.8135

Attorneys for Respondent
Eleanor Connell Hartman Ahern

Pursuant to N.R.A.P. 31(a)(1)(B) and N.R.A.P. 31(b)(2), Respondent Eleanor Ahern, by and through her counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and Appellants Jacqueline M. Montoya and Kathryn A. Bouvier, by and through their counsel of record, Rushforth Lee & Kiefer LLP, hereby state as follows:

1. The Notice of Appeal was filed in this matter on October 26, 2016;
2. Thereafter, the Court issued the Exemption from Settlement Program, ordering Appellants to file their Opening Brief and Appendix within 120 days and that the briefing shall proceed in accordance with N.R.A.P. 31(a)(1);
3. Thereafter, the parties filed a Stipulation for Extension of Time to File Opening Brief ("Stipulation"), which requested an extension of time up to and including April 3, 2017, for Appellants to file their Opening Brief;
4. The Court approved the Stipulation on March 6, 2017;
5. Thereafter, on March 28, 2017, the parties filed the Stipulation for Second Extension of Time to File Opening Brief ("Second Stipulation"), which requested an extension of time up to and including May 3, 2017, for Appellants to file their Opening Brief;
6. The Court approved the Second Stipulation;

7. On May 3, 2017, Appellants filed their Appendix and on May 4, 2017, Appellants filed their Opening Brief;
8. An extension of time for Respondent to file and serve her Answering Brief is warranted because to adequately address the issues on appeal will require additional time beyond the standard thirty (30) days provided for in N.R.A.P. 31(a)(1)(B);
9. This stipulation is made in good faith and without any intent to cause unnecessary delay in this appeal; and
10. This is Respondent's first request for any extension of time regarding briefing this appeal.

///

///

///

///

///

///

///

///

///

///

In light of the above and foregoing,

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that Respondent Eleanor Ahern shall have an extension of time of thirty (30) days, to and including Monday, July 3, 2017, in which to file her Answering Brief, which is currently due to be filed on June 2, 2017.

Dated this 1st day of June, 2017.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

RUSHFORTH LEE & KIEFER LLP

BY: /s/ Kirk B. Lenhard

KIRK B. LENHARD, ESQ.
Bar No. 1437
klenhard@bhfs.com
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

*Attorneys for Eleanor Connell
Hartman Ahern*

BY: /s/ Daniel P. Kiefer

JOSEPH J. POWELL, ESQ.
Bar No. 8875
DANIEL P. KIEFER, ESQ.
Bar No. 12419
probate@rushforthfirm.com
P.O. Box 371655
Las Vegas, NV 89137-1655

*Attorneys for Jacqueline M.
Montoya and Kathryn A. Bouvier*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed and served the foregoing **STIPULATION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on June 1, 2017, upon the following:

JOSEPH J. POWELL, ESQ.
DANIEL P. KIEFER, ESQ.
RUSHFORTH LEE & KIEFER LLP
P.O. Box 371655
Las Vegas, NV 89137-1655
probate@rushforthfirm.com
Attorneys for Jacqueline M. Montoya

I hereby certify that on June 1, 2017, I served a copy of this document by mailing a true and correct copy, postage prepaid, via U.S. Mail, addressed to the following:

MICHAEL K. WALL, ESQ.
HUTCHISON & STEFFEN, LLC
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
*Attorneys for Fredrick P. Waid,
Court-appointed Trustee*

/s/ Paula Kay
an employee of Brownstein Hyatt
Farber Schreck, LLP