

IN THE SUPREME COURT OF THE STATE OF NEVADA

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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
July 16 2017 02:03 p.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

SECOND STIPULATION FOR EXTENSION OF TIME
TO FILE ANSWERING BRIEF

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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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. As an extension of time for Respondent to file and serve her Answering Brief was warranted in order for her to adequately address the issues on appeal, on June 2, 2017, the parties filed a Stipulation For Extension Of Time To File Answering Brief ("Respondent's First Stipulation");
9. The Court signed Respondent's First Stipulation on June 2, 2017;
10. Following the Court's entry of Respondent's First Stipulation, Counsel for Respondent was involved in an eight week jury trial that recently settled;
11. In light of counsel's schedule given the foregoing, counsel for Respondent requires additional time to adequately address the issues in the Answering Brief;
12. This stipulation is made in good faith and without any intent to cause unnecessary delay in this appeal; and
13. This is Respondent's second request for any extension of time regarding briefing this appeal.

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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 additional extension of time of thirty (30) days, to and including Friday, August 4, 2017, in which to file her Answering Brief, which is currently due to be filed on July 5, 2017.

Dated this 5th day of July, 2017.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

RUSHFORTH LEE & KIEFER LLP

BY: /s/ Kirk B. Lenhard

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BY: /s/ Daniel P. Kiefer

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

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed and served the foregoing **SECOND 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 July 5, 2017, upon the following:

JOSEPH J. POWELL, ESQ.
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Attorneys for Jacqueline M. Montoya

I hereby certify that on July 5, 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:

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Court-appointed Trustee*

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