

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

Electronically Filed  
Mar 12 2019 12:32 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

In the Matter of the Estates of Thelma Ailene  
Sarge and Edwin John Sarge.

NO. 73286

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ESTATE OF THELMA AILENE SARGE;  
ESTATE OF EDWIN JOHN SARGE; AND BY  
AND THROUGH THE PROPOSED  
EXECUTRIX, JILL SARGE,

DISTRICT COURT NO.

16 RP 000091B

Appellants,

vs.

QUALITY LOAN SERVICE CORPORATION;  
and ROSE HILL, LLC,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF**

Appellants, by and through their undersigned counsel, Tory M. Pankopf (“Counsel”) move, pursuant to Rule 31(b)(3) of the Nevada Rules of Appellate Procedure, this Court for an order extending time to file their opening brief.

Based thereon, Counsel declares and states:

1. Appellants’ opening brief was due yesterday, March 11, 2019;
2. I was distracted from timely filing the request yesterday because of another clients’ file I was working on. Namely a response to a motion for judgment on the pleadings due to be filed tomorrow March 13, 2019 in the Contra

Costa Superior Court of California and a reply to an opposition to my clients' motion to strike an answer which is due the following day, Thursday, March 14, 2019 in the same court. Confounding the matter was the fact the opposition was filed last Friday and was not served on me until yesterday afternoon which, quite frankly, caused me to be distracted from the task of filing this request.

3. Pursuant to NRAP, Appellants' requested the clerk of the court extend the time the opening brief is to be filed;
4. Counsel was unable to obtain a response as to whether respondents would stipulate to the 30-day extension;
5. Counsel who is drafting Appellants' opening brief is unable to finish it by March 11, 2019, because he is a solo practitioner and has had difficulty moving and/or finding other legal counsel to cover existing obligations on his calendar to timely meet the current briefing schedule. Counsel has acted diligently and will have the opening brief completed within the time period requested;
6. Based thereon, Appellants respectfully request an additional 32-day extension to Friday, April 12, 2019, to file their opening brief.

Counsel declares under penalty of perjury under the laws of the state of Nevada the foregoing statements are true and correct.

**AFFIRMATION Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

Dated: March 12, 2019

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