## IN THE SUPREME COURT OF THE STATE OF NEVADA

7510 PERLA DEL MAR AVE TRUST.

Appellant,

VS.

BANK OF AMERICA, N.A.,

Respondent.

Case No. 7560 Electronically Filed Nov 20 2018 11:37 a.m. Elizabeth A. Brown Clerk of Supreme Court

## JOINT MOTION FOR TIME EXTENSION FOR BANK OF AMERICA'S ANSWERING BRIEF

Respondent Bank of America, N.A. (**Bank of America**) respectfully moves pursuant to NRAP 31(b)(3) for an extension of time for filing its Answering Brief. Appellant 7510 Perla Del Mar Ave Trust joins this motion and supports Bank of America's request for an additional 30 days to file its Brief.

In support of its Motion, Bank of America states as follows:

- 1. Bank of America's Answering Brief is currently due November 19, 2018. Its brief was previously due October 5, 2018, but the parties stipulated to a single extension of the deadline to November 19, 2018.
- 2. Other than the extension pursuant to the stipulation, Bank of America has not sought any other extensions of time, and thus no request for an extension of time has been denied.

3. Good cause exists for permitting Bank of America a 30-day extension of time to file its brief. This case involves important questions regarding an association's statutory lien that may be affected by recent developments in the case law. Bank of America's counsel requires additional time to fully review those developments and appropriately address them in Bank of America's brief. Additionally, Bank of America's counsel is handling a large number of pending cases before this Court, the United States Court of Appeals for the Ninth Circuit, and the Nevada state and federal trial courts, and has had numerous briefing deadlines recently. Undersigned counsel wants to ensure that it adequately addresses the issues raised in this case and has adequate time to complete the brief.

4. Bank of America is seeking a 30-day extension for filing its appellate brief, which will cause it to be due January 03, 2019. Bank of America does not intend to seek any further extensions for its Answering Brief.

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Accordingly, Bank of America respectfully requests that the Court enter an order extending the deadline for Bank of America's Answering Brief until **January** 3, 2019.

DATED November 19, 2018

AKERMAN LLP

## /s/ Jared M. Sechrist

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