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IN THE SUPREME COURT OF THE STATE OF NEVADA

145 EAST HARMON II TRUST; AND  
ANTHONY TAN AS TRUSTEE OF THE  
145 EAST HARMON II TRUST,

Appellants,

v.

THE RESIDENCES AT MGM GRAND  
TOWER A OWNERS' ASSOCIATION,

Respondent.

Supreme Court No.: 75920

Electronically Filed  
Apr 01 2019 04:46 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME  
TO FILE ANSWERING BRIEF  
(Second Request)**

Respondent's Answering Brief is due to be filed in this matter on or before April 1, 2019. Pursuant to NRAP 31(b)(3), Respondent requests an additional thirty (30) days, up to and including May 1, 2019, in which to file its Answering Brief. This is the second request filed by the Respondent for an extension of time to file its Answering Brief. It is submitted that pursuant to NRAP 31(b)(3), Mr. Larsen's Declaration presents good cause for granting this extension of time. This Motion is based on the following Declaration of Brent Larsen.

**DECLARATION OF BRENT LARSEN, ESQ.**

Brent Larsen, Esq., counsel for Respondent, under penalty of perjury, states as follows:

I am the attorney for the Respondent in the above-referenced matter.

This is the second request for an extension of time. I have contacted opposing counsel to see if he would have any objection to this requested extension and the response I received was neither yes or no but that counsel would need more time to consult with his client about such request.

The reason for this request for an extension and why the Respondent's Answering Brief has not yet been completed, is because your Declarant has not been able to work on a full time basis during the past 60 days.

Attached hereto as Exhibit A are letters from my doctor explaining the effects of open heart surgery that I am currently having to deal with. The A-fibrillation issues mentioned in

1 such letters continue to manifest themselves on a daily basis, which has subjected me to lower  
2 than normal levels of energy and significant time away from the office.

3 While I believe that the progress of my recovery from such surgery has greatly increased  
4 over the last 90 days, the fact remains that as a result of the prior surgery, I am still under  
5 considerable stress in trying to catch up on a backlog of work which accumulated during the  
6 significant downtime while I was recovering from my surgery.

7 During the past 60 days I have also had my time diverted away from the office by my  
8 having to deal with an intense and complicated family situation, wherein my son and his family  
9 of nine children recently moved into our home during that period. That situation has caused  
10 considerable stress and disruption in my personal schedule in trying to keep up with work and  
11 business matters.

12 Nonetheless I believe that I am making good progress in completing the Answering  
13 Brief and I fully expect to complete it within the next 30 days. Thus, I request an extension  
14 until May 1, 2019.

15 I declare under penalty of perjury under the laws of the United States of America and the  
16 State of Nevada that the foregoing is true and correct.

17 DATED this 1<sup>st</sup> day of April, 2019.

18 Respectfully submitted,  
19 SINGER & LARSEN P.C.

20 /s/ Brent Larsen  
21 BRENT LARSEN, ESQ.  
22 Nevada Bar No. 1184  
23 1291 Galleria Drive, #230  
24 Henderson, Nevada 89014  
25 Attorney for Respondent

26 ///

27 ///

28 ///

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1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of SINGER & LARSEN P.C.; that on the  
3 1<sup>st</sup> day of April, 2019, I caused the foregoing MOTION FOR EXTENSION OF TIME TO FILE  
4 ANSWERING BRIEF to be electronically filed and served with the Supreme Court using its  
5 electronic filing program, addressed to the following:

6 David J. Kaplan, Esq. - [djkaplan@gmail.com](mailto:djkaplan@gmail.com)  
Attorney for Appellant

7 Luis A. Ayon, Esq. - [laa@ayonlaw.com](mailto:laa@ayonlaw.com)  
8 Attorney for Appellant

9  
10 /s/ Suzanne Saavedra-Zaranti  
An Employee of Singer & Larsen P.C.

# **Exhibit A**

**Letter from Cardiologist**

# **Exhibit A**

**Letter from Cardiologist**



**ADVANCED HEART & VASCULAR SPECIALISTS**

RAM K. SINGH, M.D., F.A.C.C., F.S.C.A.I. • KATHLEEN M. BENSON, M.D., F.A.C.C.  
Interventional Cardiology and Board Certified Cardiovascular Diseases

**DEC 12 2018**

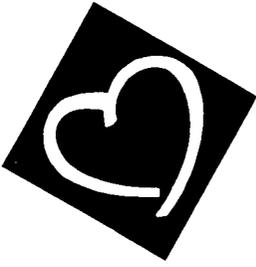
Patient: Brent Larsen  
DOB: 08/31/1951  
Regarding: Work Restrictions

To Whom It May Concern:

Mr. Brent Larsen has been under my care since November 2015. Mr. Brent Larsen has chronic coronary conditions consisting of atrial fibrillation, coronary artery disease with history of coronary bypass, dizziness, hypotension, near syncope, shortness of breath, and hypertension. Due to Mr. Brent Larsen's chronic coronary conditions it is recommended that he abstain from trial work for at least 3 months. It is recommended that Mr. Brent Larsen refrain from stressful situations and strenuous hours. Mr. Brent Larsen is still capable of performing office work at this time. Mr. Brent Larsen will be re-evaluated after 3 months and I will advise if work restrictions are further required at that time. If you have any questions please call my office at (702) 733-2982.

Sincerely,

Ram K. Singh, M.D., F.A.C.C.



**ADVANCED HEART & VASCULAR SPECIALISTS**

RAM K. SINGH, M.D., F.A.C.C., F.S.C.A.I. • KATHLEEN M. BENSON, M.D., F.A.C.C.

Interventional Cardiology and Board Certified Cardiovascular Diseases

October 19, 2018

Re: Brent Larsen

DOB: 08/31/1951

To Whom It May Concern:

Brent Larsen is a patient of mine. He is still in the process of recovering from the open heart surgery and he is currently being treated for atrial fibrillation. Consequently Mr.Larsen is still at risk from these conditions, which means I have contained to give him instructions to avoid stress and full time work days until his condition stabilizes.

Thus I recommend that Mr.Larsen receives as much patience as possible in meeting court deadlines, which can cause significant stress and potentially make his cardiac condition worse.

Sincerely,

Ram K. Singh, M.D., F.A.C.C., F.S.C.A.I.