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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  
May 01 2019 05:09 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR A ONE WEEK EXTENSION OF TIME  
TO FILE ANSWERING BRIEF  
(Third Request)**

Respondent's Answering Brief is due to be filed in this matter on or before May 1, 2019. Pursuant to NRAP 31(b)(3), Respondent requests an additional seven (7) days, up to and including May 8, 2019, in which to file its Answering Brief. This is the third 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 below 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.

The reason for this request for a one-week extension of time and why the Respondent's Answering Brief has not yet been completed, is because during the past 30 days, unforeseen circumstances have developed which have required me to leave town for extended periods of time. During the past week I have had to devote most of my time to a situation where I had to engage in extensive dealings with the Orange County, California Sheriff's Office that presented an emergency as described herein.

During the past month I have been working with an attorney in Orange County, California, to obtain an eviction of a tenant regarding valuable property owned by my client.

1           During the first week of April, I had to travel to Orange County for a trial in an unlawful  
2 detainer action wherein I was my client's key witness. That trial was scheduled on very short  
3 notice.

4           Within a few days thereafter, my wife and I needed to travel to Virginia to assist my  
5 daughter and her two young children regarding a situation where her husband, who is in the Air  
6 Force needed to leave town. Our daughter was in considerable need of assistance based on the  
7 circumstances present at that time. My wife and I were in Virginia for a full week assisting our  
8 daughter. Upon my return to Las Vegas I was able to make considerable progress on  
9 completing the brief.

10           Shortly after my return to Las Vegas, I contacted the attorney's office in Orange County  
11 to ascertain the status of the order for an eviction in the aforementioned unlawful detainer  
12 action. I was informed that the court had entered an Order for Unlawful Detainer and for Writ  
13 of Possession. However, I was also told that the Orange County Sheriff had a considerable  
14 backlog and that it would take them at least four to six weeks to be able to serve the Writ of  
15 Possession on the tenant.

16           All that changed, however, when I received a call on April 23, 2019, stating that the  
17 Sheriff's office had already served the Writ of Possession. Yet, I was also told that it would  
18 probably take another two weeks before the Sheriff's Office could come back to the property to  
19 execute on the Writ of Possession so that the actual lockout could occur. Then on early Monday  
20 morning, April 29, 2019, I received an emergency call from the Sheriff's office insisting that I  
21 be present at a lockout the next day because when the Sheriff's Office did a safety inspection on  
22 the property that day they found a knife stashed in every room in the house. Thus, the Sheriff's  
23 Office impressed upon me the need to immediately move forward with the lockout and for me  
24 to immediately have a locksmith and other people present at the property on April 30, 2019 in  
25 order to complete the lockout in San Clemente, California.

26           This emergency situation required that all of my time for the last three days be  
27 consumed with back and forth communications with my client, the Sheriff's Office, locksmiths,  
28 videographers, attorneys, security companies, and utility companies to make sure that the  
lockout could proceed as directed by the Sheriff's Office and that the property would be

1 properly secured immediately following such lockout. I had no way to calendar or anticipate  
2 this emergency situation, which was necessitated by evicting a tenant who was crazy enough to  
3 stash a knife in every room of the property during a pending eviction. Thus, I could neither  
4 foresee nor prevent the situation that I had to deal with in the last three days regarding the  
5 eviction.

6 Because I have made considerable progress in completing the Answering Brief, I am  
7 confident I can have the Brief completed within the next seven (7) days. Accordingly, I  
8 respectfully request a one-week extension of time to file the Answering Brief and Respondent's  
9 Appendix so that such documents are due on or before May 8, 2019.

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

12 DATED this 1<sup>st</sup> day of May, 2019.

13 Respectfully submitted,  
14 SINGER & LARSEN P.C.

15 /s/ Brent Larsen  
16 BRENT LARSEN, ESQ.  
17 Nevada Bar No. 1184  
18 1291 Galleria Drive, #230  
19 Henderson, Nevada 89014  
20 Attorney for Respondent

21 **CERTIFICATE OF SERVICE**

22 I HEREBY CERTIFY that I am an employee of SINGER & LARSEN P.C.; that on the  
23 1<sup>st</sup> day of May, 2019, I caused the foregoing MOTION FOR EXTENSION OF TIME TO FILE  
24 ANSWERING BRIEF to be electronically filed and served with the Supreme Court using its  
25 electronic filing program, addressed to the following:

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

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

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