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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 10 2019 05:14 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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

Respondent's Answering Brief is due to be filed in this matter on or before May 10, 2019. In the Respondent's Third Request for an Extension of Time, it asked for an additional week to file the Answering Brief. Pursuant to NRAP 31(b)(3), Respondent needs to request an additional two (2) judicial days, up to and including May 14, 2019, in which to file its Answering Brief. This is the fourth 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.

On May 1, 2019, I filed a Motion seeking a third request for an extension of time to file the Respondent's Answering Brief. Based on my Declaration in support of that Motion, I asked for a one-week extension. At that time I anticipated that an additional week would give me sufficient time to complete the Answering Brief. This court granted that Motion by extending the time to file the Answering Brief to May 10, 2019.

Unfortunately, my estimation of time that I needed to finalize the Answering Brief was off kilter. During the past two weeks I have been working diligently to shrink the size of the

1 Answering Brief. My intent in doing so is to avoid repetition as much as possible and to make  
2 the Answering Brief more efficient to read.

3 It is now apparent that I will not be able to finish the brief by today, May 10<sup>th</sup>, and  
4 therefore I am asking for an extension of time to file the Answering Brief to Tuesday, May 14,  
5 2019. Thus, I am requesting an additional two judicial days to complete the brief.

6 I am asking for this extension of time in good faith. The best explanation I can give as  
7 to why I need an additional two judicial days to complete the Answering Brief is due to the  
8 fatigue I have experienced during the past week, which I believe has resulted from my  
9 underestimation of the volume of work that needed to be done in order to better organize and  
10 shrink the Answering Brief. I am very anxious to get the Answering Brief concluded in order to  
11 get this matter behind me, because I need to move on to other matters and clients who are  
12 awaiting my attention.

13 As the filings in this case previously indicates, I am also currently burdened with an  
14 adverse heart condition known as “A-Fibrillation,” which resulted from my previous open heart  
15 surgery. During the past month, but prior to the past week, I have rarely felt any symptoms or  
16 effects from the A-Fibrillation. Unfortunately today, and three other days last week and this  
17 week, were not one of those days.

18 I saw my cardiologist last Monday to discuss my condition and whether I should  
19 undertake a further hospital procedure to try and correct the problem. My doctor advised me  
20 that when I feel extremely fatigued, as I do today, that I need to back off and put my health  
21 interest first. Today is one of those days where it is clear that I needed to leave the office early.  
22 I had intended to work with my secretary until late in the evening hours today, if necessary, to  
23 finish the brief. However, I can see that is not a realistic option. That is why I am seeking an  
24 extension to file the brief until next Tuesday, May 14, 2019.

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1 Based on the foregoing I respectfully request an additional extension of time to file the  
2 Answering Brief to May 14, 2019.

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

5 DATED this 10<sup>th</sup> day of May, 2019.

6 Respectfully submitted,  
7 SINGER & LARSEN P.C.

8 /s/ Brent Larsen  
9 BRENT LARSEN, ESQ.  
10 Nevada Bar No. 1184  
11 1291 Galleria Drive, #230  
12 Henderson, Nevada 89014  
13 Attorney for Respondent

14 **CERTIFICATE OF SERVICE**

15 I HEREBY CERTIFY that I am an employee of SINGER & LARSEN P.C.; that on the  
16 10<sup>th</sup> day of May, 2019, I caused the foregoing MOTION FOR EXTENSION OF TIME TO  
17 FILE ANSWERING BRIEF to be electronically filed and served with the Supreme Court using  
18 its electronic filing program, addressed to the following:

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

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

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