

IN THE SUPREME COURT OF THE STATE OF NEVADA

9352 CRANESBILL TRUST;
TEAL PETALS ST. TRUST;
AND IYAD HADDAD,

Appellants,

vs.

WELLS FARGO BANK, N.A.,

Respondent.

Supreme Court Case No. 76017 Filed
Electronically
Mar 13 2019 02:22 p.m.
District Court Case No. 16-1510
Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

**From the Eighth Judicial District Court
The Honorable Linda Bell**

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

Andrew M. Jacobs
Nevada Bar No. 12787
Kelly H. Dove
Nevada Bar No. 10569
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
ajacobs@swlaw.com
kdove@swlaw.com

Attorneys for Respondent Wells Fargo Bank, N.A.

NRAP 26.1 Disclosure Statement

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed. These representations are made so the Justices of this Court may evaluate possible disqualification or recusal.

The following have an interest in the outcome of this case or are related to entities interested in the case:

- Wells Fargo Bank, N.A.;
- 9352 Cranesbill Trust;
- Teal Petals St. Trust; and
- Iyad Haddad

There are no other known interested parties.

Snell & Wilmer L.L.P. has represented *Wells Fargo Bank, N.A.* in this matter.

MEMORANDUM OF POINTS AND AUTHORITIES

Respondent moves for a 14-day extension of time for filing the Answering Brief from the current date due of March 13, 2019, making the brief due March 27, 2018 pursuant to NRAP 27 and NRAP 31(b). Counsel sought and obtained the fourteen-day telephonic extension permitted under NRAP 31. However, counsel requires modest additional time to complete the Answering Brief due to a combination of family illness and an unanticipated confluence of urgent matters demanding immediate attention. The entire length of extension sought for the Answering Brief still totals only 28 days, which is less than the length of extension permitted by stipulation of the parties (along with the approval of the Court). Because the Answering Brief is substantially complete, counsel represents that she has no intention to seek any additional extensions. Nor will this extension cause prejudice to the parties, as this appeal will be fully briefed and ready for determination by the filing of the Reply Brief no later than March 27. This extension is not sought for the purpose of delay.

Based upon the foregoing, the Respondent respectfully requests that the Court grant its Motion for Extension of Time to File the Answering Brief, giving them up to and including March 27, 2019 to file.

Conclusion

Based upon the foregoing, Respondent respectfully requests that the Court grants its Motion for Extension of Time to File Answering Brief, allowing it up to and including March 27, 2019.

DATED: March 13, 2019

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove
ANDREW M. JACOBS
Nevada Bar No. 12787
KELLY H. DOVE
Nevada Bar No. 10569
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Attorneys for Respondent
Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On March 13, 2019, I caused to be served a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** upon the following by the method indicated:

- ☐ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the e-mail addresses set forth below and/or included on the Court's Service List for the above-referenced case.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below:

/s/ Tonya Binns
An Employee of SNELL & WILMER L.L.P.

4823-8398-8618