#### 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 Cased You Wally Filed Mar 27 2019 04:02 p.m. District Court Cased Yaben Al 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

(Second Request by Motion)

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 <u>ajacobs@swlaw.com</u> kdove@swlaw.com

Attorneys for Respondent Wells Fargo Bank, N.A.

#### 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 27, 2019, making the brief due April 10, 2018 pursuant to NRAP 27 and NRAP 31(b).

Counsel sought and obtained the fourteen-day telephonic extension permitted under NRAP 31, followed by a fourteen-day extension by motion. However, counsel requires additional time to complete the Answering Brief due to the combination of an emergent and life-threatening illness of an extremely close family friend for whom I was the only local source of assistance and support, and a number of urgent matters demanding immediate attention, in part relating to unexpected personnel changes. The Answering Brief is substantially complete and counsel represents that she has no intention to seek any additional extensions. Nor will this extension cause prejudice to the parties, as Appellant has possession of the Property at issue. 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 April 10, 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 April 10, 2019.

DATED: March 27, 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 27, 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:

	<b>BY E-MAIL:</b> 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.
$\boxtimes$	<b>BY ELECTRONIC SUBMISSION:</b> submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
	<b>BY U.S. MAIL:</b> 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/ Ruby Lengsavath

An Employee of SNELL & WILMER L.L.P.

4823-8398-8618