

1                   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

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3           HELIX ELECTRIC OF NEVADA,  
          LLC,

4                   Appellant/Cross-Respondent,

5                   vs.

6           APCO CONSTRUCTION, INC.,

7                   Respondent/Cross-Appellant.

Case No. 77320/80508  
District Court Case No. A571228

Electronically Filed  
May 20, 2021 05:36 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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9           **RESPONDENT/CROSS-APPELLANT APCO CONSTRUCTION, INC.'S**  
10           **UNOPOSED MOTION TO EXTEND TIME TO FILE CROSS REPLY**  
11                                   **BRIEF**

11                                   **FENNEMORE CRAIG, P.C.**

12                                   John Randall Jefferies, Esq.

13                                   Nevada Bar No. 3512

14                                   Christopher H. Byrd, Esq.

15                                   Nevada Bar No. 1633

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17                                   Las Vegas, Nevada 89101

18                                   -and-

19                                   Jack Chen Min Juan, Esq.

                                  Cody S. Mounteer, Esq.

**MARQUIS AURBACH COFFING**

                                  10001 Park Run Drive

                                  Las Vegas, NV 89145

*Attorneys for Respondent/Cross-Appellant APCO Construction, Inc.*

1 UNOPPOSED MOTION

2 Pursuant to NRAP 31(b)(2) and (3), Respondent/Cross-Appellant APCO  
3 Construction, Inc. (“APCO”) respectfully requests an extension to June 4, 2021  
4 to file Respondent’s Reply Brief on Cross Appeal (“Brief”). The Brief was due  
5 May 5, 2021, but was not completed timely because the due date was not  
6 properly calendared.

7 Appellant/Cross-Respondent, Helix Electric of Nevada, LLC (“HELIX”),  
8 by and through its counsel, Eric B. Zimbleman, Esq., has consented to the  
9 requested extension. See the Stipulation to Extend Time attached as **Exhibit**  
10 **“1”**.

11 This extension is being requested because of the calendaring error. The  
12 error was discovered on May 20, 2021 when counsel called the Clerk of the  
13 Court about an extension. A draft of the brief has been prepared and no further  
14 extensions will be required.

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1 **CONCLUSION**

2 Based on the foregoing, APCO respectfully requests that the Court extend  
3 time for Respondent/Cross-Appellant to file its Reply Brief on Cross Appeal to  
4 June 4, 2021.

5 DATED this 20<sup>th</sup> day of May, 2021.

6 **FENNEMORE CRAIG, P.C.**

7 /s/ Christopher H. Byrd  
8 John Randall Jefferies, Esq.  
9 Nevada Bar No. 3512  
Christopher H. Byrd, Esq.  
Nevada Bar No. 1633  
*Attorneys for Appellants*



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# EXHIBIT 1

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# EXHIBIT 1

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1 Respondent/Cross-Appellant APCO CONSTRUCTION, INC., by and through its  
2 attorneys Fennemore Craig, P.C. and Appellant/Cross-Respondent HELIX ELECTRIC OF  
3 NEVADA, LLC, by and through their attorneys Peel Brimley LLP, hereby stipulate to  
4 extend the time for APCO to file its Reply Brief until June 4, 2021.

5 This stipulation is being made in good faith and not for the purposes of delay.

6 Dated this 20<sup>th</sup> day of May, 2021.

Dated this 20<sup>th</sup> day of May, 2021.

7 **FENNEMORE CRAIG, P.C.**

**PEEL BRIMLEY LLP**

8 By: /s/Christopher H. Byrd, Esq.

By: 

9 John Randall Jefferies, Esq. (No. 3512)  
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