Case No. 77320 Consolidated with 80508

In the Supreme Court of Nevada Electronically Filed

Electronically Filed Apr 11 2022 07:07 p.m. Elizabeth A. Brown Clerk of Supreme Court

HELIX ELECTRIC OF NEVADA, LLC,

Appellant/Cross-Respondent,

VS.

APCO CONSTRUCTION, INC., A NEVADA CORPORATION,

Respondents/Cross-Appellant.

MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR REHEARING

Helix Electric of Nevada, LLC requests a 30-day extension of the deadline in which to petition for rehearing pursuant to NRAP 40, through May 11, 2022. NRAP 26(b)(1)(A). Without an extension, the petition would be due April 11, 2022. This is the first such motion related to this brief. And no prior requests for extension in this case have been denied or denied in part.

Good cause justifies the additional time. Undersigned counsel entered the case recently to assist with the petition and continue to familiarize themselves with the record. Work on the brief also has

been hindered while attorneys at both Lewis Roca and Peel Brimley, Helix's principle law firm, have been out for long-planned family vacations and to deal with personal issues. The additional time will enable Helix's counsel to ensure the petition addresses all (but only) points and authorities essential to appropriate reassessment of the precedent-setting opinion in this important case.

Helix appreciates the Court's consideration.

Dated this 11th day of April, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Joel D. Henriod

DANIEL F. POLSENBERG (SBN 2376) JOEL D. HENRIOD (SBN 8492) 3993 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 (702) 949-8200

RICHARD L. PEEL (SBN 4359) ERIC B. ZIMBELMAN (SBN 9407) PEEL BRIMLEY LLP 3333 East Serene Avenue Suite 200 Henderson, Nevada 89074 (702) 990-7272

Attorneys for Appellant/Cross-Respondent Helix Electric of Nevada, LLC

CERTIFICATE OF SERVICE

I certify that on April 11, 2022 I submitted the foregoing "Motion for Extension of Time to File Petition for Rehearing" for e-filing and service via the Court's eFlex electronic filing system. Electronic service of the forgoing documents shall be mad upon all parties listed on the Master Service List.

Christopher H. Byrd, Esq.
John Randall Jeffries, Esq.
FENNEMORE CRAIG
9275 W. Russell Road
Suite 240
Lave Vegas, Nevada 89148
T: (702) 692-8000

Jack Chen Min Juan, Esq.
Cody S. Mounteer, Esq.
Tom W. Steward, Esq.
MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, NV 89145
T: (702) 382-0711

APCO Construction, Inc.

Attorneys for Respondent/Cross Appellant

<u>/s/ Cynthia Kelley</u>
An Employee of Lewis Roca Rothgerber Christie LLP