

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROSAISET JARAMILLO, AS SPECIAL
ADMINISTRATOR OF THE ESTATE OF
MARIA JARAMILLO

APPELLANT,

VS.

SUSAN R. RAMOS, M.D., F.A.C.S.,

RESPONDENT.

CASE NO. 77385

Electronically Filed
Jun 14 2019 10:29 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME (Second Extension; First by Motion)

COMES NOW appellant, above named, acting by and through her counsel of record, William C. Jeanney, Esq., of the law firm of Bradley, Drendel and Jeanney, and hereby moves for a 30-day extension, to and including July 17, 2019, within which to serve and file her reply brief. This motion is based upon the accompanying memorandum of points and authorities and all other matters properly of record.

MEMORANDUM OF POINTS AND AUTHORITIES

FACTS

The following information is provided pursuant to NRAP 31(b)(3)(A):

- i. The reply brief is currently due on June 17, 2019;
- ii. There has been one previous extension of time, which was by stipulation pursuant to NRAP 31(b)(2). The reply brief was originally due on May 17, 2019.
- iii. No previous extension requests were denied or denied in part.
- iv. The extension request is necessary because the attorney for Appellant's

just finished a two week trial in Carson City, *Angel v. Brabender, et al.* First Judicial Case Number 17 TRT 00049 1B; was preparing for a medical malpractice trial (*Henson v. Renown, et al.*, Second Judicial District Case No. CV16-01046) that was to begin on June 17, 2019 that was just settled on June 6th; and has a complex products liability case that is scheduled for a four week trial to begin on August 5, 2019 (*Robinson v. Crown, et al.*, Second Judicial District Court Case No. CV17-02384). As a result of the upcoming trial, the attorney was just recently served with a Motion for Summary Judgment and the Motions for Limine are due shortly. In addition said attorney has been preparing for an expert deposition in said case in which he must go to Portland, Oregon tomorrow for the deposition on Friday; and two other expert depositions for which he will be in Dayton, Ohio and Memphis, Tennessee from June 25th through June 28th.

In addition Appellant's attorney was recently served two other Motions for Summary Judgment and a Motion to Exclude an Expert in another products liability case, *Otto v. Refacciones Neumaticas La Paz, S.A. DE C.V., et al.*, United States District Court Case No. 3:16-CV-00451-MMD-WGC.

This and other factors have impeded the progress on the reply brief, although it is estimated that it is about 50% complete notwithstanding these difficulties.

v. Appellant requests a 30-day extension, to and including July 17, 2019, within which to serve and file her reply brief.

LEGAL DISCUSSION

NRAP 31(b)(3)(B) provides that the court may grant extensions of time beyond which the parties are permitted to stipulate upon a “clear showing of good cause.” It is respectfully submitted that the heavy briefing schedule in the other cases listed above and the out of state depositions over the next three weeks would show good cause. Moreover, in communications with counsel for the respondent, my office was informed that the instant motion would not be opposed.

CONCLUSION

For all the foregoing reasons, appellants respectfully submit that their motion for a 30-day extension of time should be granted.

DATED this 14th day of June, 2019.

BRADLEY, DRENDEL & JEANNEY

/s/ William C. Jeanney
William C. Jeanney, Esq.

CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of BRADLEY, DRENDEL & JEANNEY, and that on this date, I served a true and correct copy of the foregoing on the party(s) set forth below by:

 x All parties signed up for electronic filing have been served electronically, all others have been served by placing a true copy thereof in a sealed envelope placed for collecting and mailing in the United States mail, at Reno, Nevada, postage prepaid, following ordinary business practices

addressed as follows:

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Attorneys for: Susan R. Ramos, M.D.

DATED this 14th day of June 2019.

/s/ Reva S. Archer
Reva S. Archer