

Case No. 78085

**In the Supreme Court of Nevada**

CHEYANNE NALDER, and GARY LEWIS,  
Petitioners,

*vs.*

THE EIGHTH JUDICIAL DISTRICT COURT of  
the State of Nevada, in and for the County  
of Clark; THE HONORABLE DAVID M. JONES,  
District Judge; and THE HONORABLE ERIC  
JOHNSON, District Judge,

Respondents,

and

UNITED AUTOMOBILE INSURANCE COMPANY,  
Real Party in Interest.

Electronically Filed  
Apr 11 2019 04:22 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION TO FILE ANSWER**

Real party in interest United Automobile Insurance Company (UAIC) requests 60 days, through June 10, 2019, to file its answer. NRAP 31(b)(3). This is the first such request. The answer would otherwise be due April 11, 2019.

Additional time is necessary to complete the answer. This case involves a complex procedural history across several actions in multiple fora. A correct understanding of that history is necessary to understand the district court's exercise of discretion in allowing intervention. The extension will also allow UAIC to address the somewhat interrelated

issues in Docket No. 78243, in which this Court has also ordered an answer.

In addition, UAIC's lead appellate counsel had long-planned engagements that require his travel abroad. Immediately after appearing before the Legislature at the request of one of the Justices, counsel had to depart for conferences in Philadelphia and London. The requested extension will allow him time upon his return to oversee the preparation and finalization of the answer.

At the time this Court ordered an answer, the parties were also preparing for a mediation and addressing petitioners' motions in actions at the trial-court level, requiring UAIC's counsel to take time away from the preparation of the answer to work toward a resolution of the case.

Alternatively, although lead counsel will still be traveling during this time, UAIC requests an extension of at least 32 days, through May 13.

Dated this 11th day of April, 2019.

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**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 11th day of April, 2019. Electronic service of the foregoing “Motion for Extension to File Answer to Petition for Writ of Mandamus” shall be made in accordance with the Master Service List as follows:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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