

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
Jun 10 2019 04:58 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 30 days, through July 10, 2019, to file its answer. NRAP 31(b)(3). This is the second such request. The answer would otherwise be due June 10, 2019.

Additional time is needed to complete the answer. As this Court may be aware, Mr. Polsenberg has been ill for most of the past several weeks following an illness contracted overseas. He also had to take time away from the preparation of the brief to care for a dying family pet. Given these exigencies, Mr. Polsenberg had to devote his limited

capacity primarily to the preparation for oral argument of the certified question from the Ninth Circuit in related litigation, *Nalder v. United Automobile Insurance Company*, Case No. 70504. The requested extension will allow counsel to recuperate and to finalize the brief for filing. In these extraordinary circumstances, counsel request the Court's courtesy in granting this extension.

Dated this 10th day of June, 2019.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Abraham G. Smith

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 10th day of June, 2019. Electronic service of the foregoing “Motion for Extension to File Answer” 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:

The Honorable David Jones
Department 29
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The Honorable Eric Johnson
Department 20
REGIONAL JUSTICE CENTER
Courtroom 12A
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/s/ Adam Crawford
An Employee of Lewis Roca Rothgerber Christie LLP