

**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 17 2019 04:46 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 17, 2019, to file its answer. NRAP 31(b)(3). This is the second such request. The answer would otherwise be due June 17, 2019.

Additional time is needed to complete the answer. As this Court may be aware, Mr. Polsenberg was 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 addition, the extension will facilitate the coordinated preparation of UAIC's answers in the related writ petition, *Nalder v. Eighth Judicial District Court*, Docket No. 78085.

In these extraordinary circumstances, counsel request the Court's courtesy in granting this extension.

Dated this 17th day of June, 2019.

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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 June 17, 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  
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The Honorable Eric Johnson  
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/s/Adam Crawford  
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