

IN THE SUPREME COURT OF THE STATE OF NEVADA

REPUBLIC SILVER STATE DISPOSAL,
INC., A NEVADA CORPORATION

Appellant,

vs.

ANDREW M. CASH, M.D.; ANDREW M.
CASH, M.D., P.C. aka ANDREW
MILLER CASH, M.D., P.C.; AND
DESERT INSTITUTE OF SPINE CARE,
LLC, A NEVADA LIMITED LIABILITY
COMPANY,

Respondents.

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Supreme Court Case No.: 78572
District Court Case No.: A738123

**RESPONDENTS, ANDREW M. CASH, M.D.; ANDREW M. CASH, M.D.,
P.C., aka ANDREW MILLER CASH, M.D., P.C.; and DESERT INSTITUTE
OF SPINE CARE, LLC'S OPPOSITION TO APPELLANT REPUBLIC
SILVER STATE DISPOSAL, INC.'S MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEF**

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Respondents, Andrew M. Cash, M.D.; Andrew M. Cash, M.D., P.C., aka Andrew Miller Cash, M.D., P.C.; and Desert Institute of Spine Care, LLC, by and through their counsel of record, Robert C. McBride, Esq. and Heather S. Hall, Esq. of the law firm of McBride Hall, hereby presents this Opposition to Appellant's Motion for Extension of Time to File Reply Brief.

Dated this 4th day of August, 2020.

McBRIDE HALL

/s/Heather S. Hall

ROBERT C. McBRIDE, ESQ.

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Attorneys for Respondents/Cross-Appellants

MEMORANDUM OF POINTS AND AUTHORITIES

Per this Court's Order Granting Motion, filed on July 21, 2020, "[n]o further extensions of time shall be permitted absent demonstration of extraordinary circumstances and extreme need." This Court has further stated that Counsel's workload will not be deemed such an extraordinary circumstance and yet, Appellant is now requesting another extension based upon counsel's inability to review his own work and devote the time necessary to same. In an unpublished decision regarding a pretrial appeal of the suppression of witnesses identifications, this Court noted that the State had been granted three extensions and ultimately stated "the State had 84 days to file the opening brief, which was sufficient time to prepare and file an opening brief, particularly in light of the limited scope of this appeal." *See State v. Gomez*, 2018 Nev. App. Unpub. LEXIS 209, *1, 2018 WL 1876201 (2018). Appellant has had ample time, in addition to a prior extension, to prepare and review their Reply Brief. Respondent should not be prejudiced by such dilatory conduct and as such, opposes this Motion.

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Based upon the foregoing, Respondents respectfully request that this Honorable Court deny the Motion for Extension of Time to File Reply Brief and order an immediate reply brief be filed on behalf of Republic.

Dated this 4th day of August, 2020.

McBRIDE HALL

/s/Heather S. Hall

ROBERT C. McBRIDE, ESQ.

Nevada Bar No.: 007082

HEATHER S. HALL, ESQ.

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Las Vegas, Nevada 89113

Attorneys for Respondents/Cross-Appellants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of August, 2020, service of the foregoing **RESPONDENTS, ANDREW M. CASH, M.D.; ANDREW M. CASH, M.D., P.C., aka ANDREW MILLER CASH, M.D., P.C.; and DESERT INSTITUTE OF SPINE CARE, LLC'S OPPOSITION TO APPELLANT REPUBLIC SILVER STATE DISPOSAL, INC.'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was served electronically to all parties of interest through the Court's CM/ECF system as follows:

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An employee of
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