

IN THE SUPREME COURT OF THE STATE OF NEVADA

NAUTILUS INSURANCE GROUP

Appellant,

V.

ACCESS MEDICAL, LLC; ROBERT
CLARK WOOD, II; AND FLOURNOY
MANAGEMENT, LLC,

Respondents.

Supreme Court Case No.: 79130

Electronically Filed
United States District Court, 2019 05:44 p.m.
For the District of Nevada, Elizabeth A. Brown
Case No.: 2:15-cv-00321 Clerk of Supreme Court

United States Court of Appeals for the
Ninth Circuit:

Case No.'s: 17-16265

17-16272

17-16273

MOTION FOR EXTENSION OF TIME PURSUANT TO NRAP 31(b)(3) TO

FILE RESPONDENTS' RESPONSE BRIEF

JORDAN P. SCHNITZER, ESQ.

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*Attorneys for Respondents,
ACCESS MEDICAL, LLC and
ROBERT CLARK WOOD, II*

COME NOW Respondents, ACCESS MEDICAL, LLC and ROBERT CLARK WOOD, II, by and through their attorneys THE SCHNITZER LAW FIRM and the law firm KRAVITZ, SCHNITZER & JOHNSON, CHTD., hereby request an extension of time pursuant to NRAP 31(b)(3) for 30 days in which to file its response brief in this matter. The brief is currently due on December 20, 2019 and the requested due date for the brief would be January 20, 2020. This is the first extension request by the moving party.

This request is made for several reasons:

1. The undersigned previously stipulated to an identical 30-day extension for the opposition to file its opening brief. In granting the extension, opposing counsel agreed they would provide a similar courtesy given the initial extension would push the current due date between the holiday season;
2. After the initial due date for the opponent's brief, this Court accepted an amicus brief, giving the undersigned less than the standard time to address the issue;
3. Counsel for the opposition initially agreed to grant the reciprocal 30-day extension but then sent an email withdrawing the stipulation without any further explanation;
4. The undersigned relied upon the representations counsel made regarding a reciprocal extension in planning and allotting time to research and briefing;

5. Counsel requires more time to file its brief as this matter involves a complex issue of first impression for this Court, requiring significant research time, as well as the fact that the briefing period included a lengthy holiday period for Thanksgiving.
6. 14 days would be insufficient due to the upcoming additional Court holidays for Christmas and the new year.

See Declaration Under Oath of Jordan P. Schnitzer, Esq. attached as **Exhibit 1**.

DATED this 17th day of December 2019.

THE SCHNITZER LAW FIRM

BY: /s/ Jordan P. Schnitzer, Esq.
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Attorney for Plaintiffs,
ROBERT “SONNY” WOOD, II and
ACCESS MEDICAL, LLC

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of THE SCHNITZER LAW FIRM and on the 17th day of December 2019, a true and correct copy of the above and foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system and by United States First Class mail to all unregistered parties as listed below:

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/s/ Melisa A. Gabhart
An Employee of
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**DECLARATION OF JORDAN P. SCHNITZER, ESQ. IN SUPPORT OF
MOTION FOR EXTENSION OF TIME PURSUANT TO NRAP 31(b)(3) TO
FILE RESPONDENTS' RESPONSE BRIEF**

JORDAN P. SCHNITZER, ESQ.

Nevada Bar No. 10744

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*Attorneys for Respondents,
ACCESS MEDICAL, LLC and
ROBERT CLARK WOOD, II*

I, Jordan P. Schnitzer, Esq., counsel for the Respondents, ACCESS MEDICAL, LLC and ROBERT CLARK WOOD, II identified in the above-captioned case, declare under penalty of perjury as follows:

1. I am a licensed attorney in good standing and am admitted to practice law in all Courts in the State of Nevada.
2. I am the founding attorney with The Schnitzer Law Firm and in that capacity, represent Respondents, ACCESS MEDICAL, LLC and ROBERT CLARK WOOD, II, within this action. On that basis, I have personal knowledge of the facts and circumstances contained within this Declaration.
3. The undersigned previously stipulated to an identical 30-day extension for the opposition to file its opening brief. In granting the extension, opposing counsel agreed they would provide a similar courtesy given the initial extension would push the current due date between the holiday season;
4. After the initial due date for the opponent's brief, this Court accepted an amicus brief, giving the undersigned less than the standard time to address the issue;
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8. 14 days would be insufficient due to the upcoming additional Court holidays for Christmas and the new year.

DATED this 17th day of December 2019, at Las Vegas, Nevada.

/s/ Jordan P. Schnitzer, Esq.

Jordan P. Schnitzer, Esq.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of THE SCHNITZER LAW FIRM and on the 17th day of December 2019, a true and correct copy of the above and foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system and by United States First Class mail to all unregistered parties as listed below:

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