Case No. 79224

In the Supreme Court of Nevada

| THE STATE OF NEVADA DEPARTMENT OF BUSINESS AND INDUSTRY, FINANCIAL INSTITUTIONS DIVISION, Appellant, vs. | Electronically Filed Mar 18 2020 03:27 p.m. Elizabeth A. Brown Clerk of Supreme Court |
|--|---|
| TITLEMAX OF NEVADA, INC., a Delaware corporation, | |
| Respondent, | |

SECOND MOTION FOR EXTENSION TO FILE ANSWERING BRIEF

Respondent TitleMax of Nevada, Inc. requests a 32-day extension through April 20, 2020, to file the answering brief. NRAP 31(b)(3). This is the second motion for extension. (The parties previously stipulated to extend the deadline pursuant to NRAP 31(b)(2), and respondent's first motion for extension was granted.) The brief was originally due January 17, 2020 and, without an extension, would be due March 19, 2020.

While a draft of the brief is nearly complete, additional time is needed to hone the arguments, make the brief more succinct, and allow for client review. Completion of the brief has been delayed over the last 30 days for multiple reasons, including an illness that swept across the

drafting lead attorney's entire family, including herself and her two young children. Completion of the brief was further hindered by the outbreak of COVID-19 and the unusual work schedules and practices caused by the outbreak. For example, remote work practices were instituted, and the drafting attorney and paralegal assisting with the appeal were impacted by school closures and the need to care for their young children while trying to work.

The additional time will enable respondent's counsel to ensure that all relevant authorities and considerations in this important appeal are presented as thoroughly and succinctly as possible.

Dated this 18th day of March, 2020.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Dale Kotchka-Alanes

Daniel F. Polsenberg (SBN 2376)

Joel D. Henriod (SBN 8492)

Dale Kotchka-Alanes (SBN 13,168)

3993 Howard Hughes Parkway,

Suite 600

Las Vegas, Nevada 89169

(702) 949-8200

Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify that on March 18, 2020, I submitted the foregoing "Motion for Extension to File Respondent's Answering Brief" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

AARON D. FORD HEIDI PARRY STERN (SBN 8873) DAVID J. POPE (SBN 8617) VIVIENNE RAKOWSKY (SBN 9160) 555 East Washington Avenue, Suite 3900 Las Vegas, Nevada 89101

Attorneys for Appellant

/s/Lisa M. Noltie
An Employee of Lewis Roca Rothgerber Christie LLP