

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE SUPREME COURT OF THE STATE OF NEVADA

NONA TOBIN, AS TRUSTEE OF
THE GORDON B. HANSEN TRUST,
DATED 8/22/08,

Appellant,

vs.

JOEL A. STOKES; SANDRA F.
STOKES, AS TRUSTEE OF THE
JIMIACK IRREVOCABLE TRUST;
YUEN K. LEE, AN INDIVIDUAL,
D/B/A MANAGER; F. BONDURANT,
LLC; SUN CITY ANTHEM
COMMUNITY ASSOCIATION, INC.;
AND NATIONSTAR MORTGAGE,
LLC,

Respondents.

No. 79295

Electronically Filed
May 29 2020 10:27 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**SUN CITY ANTHEM COMMUNITY ASSOCIATION'S
FIRST MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF**

LIPSON NEILSON P.C.
Kaleb D. Anderson, Esq. (Bar No. 7582)
David T. Ochoa, Esq. (Bar No. 10414)
9900 Covington Cross Dr., Suite 120
Las Vegas, NV 89148
Attorneys for Sun City Anthem Community Association

1 COMES NOW Respondent SUN CITY ANTHEM COMMUNITY
2 ASSOCIATION (hereafter “SCA” or “HOA”) by and through its counsel of record
3 LIPSON NEILSON P.C., hereby moves this Court for an extension of time to file
4 its Answering Brief, an intended Joint Answering Brief.
5

6 **MEMORANDUM OF POINTS AND AUTHORITIES**
7

8 SCA respectfully requests that the Court extend the time pursuant to NRAP
9 26(b)(1)(B) and/or 31(b)(3) to file its Answering Brief for good cause and
10 extraordinary and compelling circumstances. SCA intends to file a Joint
11 Answering Brief with Respondents Joel A. Stokes; Sandra F. Stokes, as Trustees of
12 the Jimijack Irrevocable Trust; Yuen K. Lee, an individual, d/b/a Manager, F.
13 Bondurant, LLC (collectively Jimijack).¹ Counsel for Sun City Anthem continues
14 to work remotely due to COVID-19, and requires additional time to confer with
15 counsel for Jimijack that is also working remotely and out of state. Jimijack
16 recently received an extension until July 1, 2020. SCA requests an extension to
17 July 1, 2020 to complete a Joint Answering Brief with Jimijack.² The requested
18 extension will not materially delay resolution of this case and SCA does not
19 anticipate requesting any further extensions.
20
21
22
23

24 ///

25
26 ¹ Nationstar Mortgage, LLC may potentially also be part of the Joint Answering
Brief.

27 ² I, David Ochoa, declare that I have been in communication with counsel for
28 Jimijack and we have agreed to work toward filing a Joint Answering Brief.

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONCLUSION

Based on the foregoing, SCA respectfully requests a 30-day extension to July 1, 2020, to file a Joint Answering Brief. This request is made in good faith and not for delay.

DATED this 29th day May 2020.

LIPSON NEILSON, P.C.

By: s/ David Ochoa
Kaleb D. Anderson, Esq. (Bar No. 7582)
David T. Ochoa, Esq. (Bar No. 10414)
9900 Covington Cross Dr., Suite 120
Las Vegas, NV 89148

Attorneys for Sun City Anthem Community Association

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May, 2020, service of the foregoing **SUN CITY ANTHEM COMMUNITY ASSOCIATION’S FIRST MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF** was made by electronic submission and filing of the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

Melanie Morgan, Esq.
Donna Wittig, Esq.
AKERMAN LLP
1635 Village Center Circle Ste. 200
Las Vegas, NV 89134
Melanie.morgan@akerman.com
Donna.wittig@akerman.com

Attorneys for Nationstar

Joseph Y. Hong, Esq.
HONG & HONG
10781 W. Twain Avenue
Las Vegas, NV 89135

Attorneys for Jimijack

Joe Coppedge, Esq.
Michael R. Mushkin & Associates,
P.C.
4475 S. Pecos Road
Las Vegas, NV 89121

*Attorney for Nona Tobin Trustee of the
Gordon B. Hansen Trust, dated 8/22/15*

/s/ Juan Cerezo

An Employee of LIPSON NEILSON P.C.