

In the Supreme Court of Nevada

DESIRE EVANS-WAIAU, individually;
GUADALUPE PARRA-MENDEZ,
individually,

Appellants,

vs.

BABYLYN TATE ,

Respondent,

Electronically Filed
Aug 31 2020 11:28 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION TO FILE ANSWERING BRIEF

Respondent Babylyn Tate requests an extension of four days, through September 4, 2020, to file her answering brief. NRAP 31(b)(3). This is the fourth such motion. (The parties previously stipulated to extend the deadline pursuant to NRAP 31(b)(2).) The brief was originally due May 18, 2020, and without an extension, would be due August 31, 2020. No requests for extension have been denied or denied in part.

Undersigned counsel has never before asked for this many extensions and certainly appreciates the extraordinary nature of it. Briefing is complete—several times over, in fact. Unfortunately, it was discovered today that attorneys have been editing competing versions of the brief over the last few days, unbeknownst to each other.

The logistical fog has been exacerbated by an attempt to trim a few thousand words from the last draft(s) in order to meet the word limit, as well as operational complications arising from all team members working remotely. On top of that, the coordinating author was in a significant car accident last week. (Thankfully, she was not injured terribly.)

As a result, respondent has serious concerns about whether important edits made to previous drafts of the brief are included in the current version, whether citations to the record are accurate and complete, and whether essential legal authorities remain. This short, additional extension will enable counsel to ensure quality and prevent the need for filing an amended brief.

Dated this 31st day of August, 2020.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Joel D. Henriod
DANIEL F. POLSENBERG (SBN 2376)
JOEL D. HENRIOD (SBN 8492)
ADRIENNE BRANTELY-LOMELI (14,486)
3993 Howard Hughes Parkway
Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify that on August 31, 2020, I submitted the foregoing
“Motion for Extension to File Answering Brief” for filing *via* the Court’s
eFlex electronic filing system. Electronic service shall be made in
accordance with the Master Service List as follows:

DENNIS M. PRINCE (SBN 5092)
KEVIN T. STRONG (SBN 12,107)
PRINCE LAW GROUP
10801 W. Charleston Boulevard
Suite 560
Las Vegas, Nevada 89135
(702) 534-7600

Attorneys for Appellants

/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber
Christie LLP