

SUPREME COURT OF THE STATE OF NEVADA

SATICOY BAY, LLC SERIES 34
INNISBROOK,

Appellant,

vs.

THORNBURG MORTGAGE
SECURITIES TRUST 2007-3,
FRANK TIMPA; MADELINE
TIMPA; TIMPA TRUST; RED
ROCK FINANCIAL SERVICES,
LLC; SPANISH TRAIL MASTER
ASSOCIATION ; REPUBLIC
SERVICES; AND LAS VEGAS
VALLEY WATER DISTRICT,

Respondents.

Supreme Court Case No.: 80111

District Court Case No.
A-14-710161-C

Electronically Filed
Mar 12 2021 04:17 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

From the Eighth Judicial District Court
The Honorable Gloria Sturman

**RESPONDENT SPANISH TRAIL MASTER ASSOCIATION'S
UNOPPOSED MOTION TO EXTEND TIME TO FILE ANSWERING
BRIEF**

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Attorneys for Respondent Spanish Trail Master Association

Respondent Spanish Trail Master Association (“Association”) respectfully submits this motion, pursuant to NRAP 31(b)(3), requesting this court extend the time to file the answering brief. The Association requests a 30-day extension, up to and including April 15, 2021.

Pursuant to NRAP 31(b)(3)(A), the Association submits the following information:

- i. The answering brief is currently due on March 15, 2021.
- ii. The Association obtained a telephonic extension of the answering brief deadline on February 25, 2021, which set the deadline for the answering brief for March 15, 2021.
- iii. This is the Association's first motion request.
- iv. No requests for extension of time have been denied.
- v. Counsel for Appellant Saticoy Bay, LLC Series 34 Innisbrook does not oppose this extension request.
- vi. Good cause exists to extend the time to file the answering brief because of the complexity of the issues involved in this case. Specifically, this case involves challenges to multiple orders of the district court below, some of which were issued prior to controlling authority being issued by this Court. Moreover, since filing of the Appeal, Thornburg Mortgage Securities has resolved its dispute with Appellant and is no longer participating in this appeal which

potentially raises additional issues. In order to adequately brief these issues, the Association requires this additional extension.

Moreover, as the Court is aware, Nevada is still in the midst of the COVID-19 pandemic. As a result of the efforts taken to assist in slowing the spread of the virus, counsel for the Association has had limited access to the resources necessary to prepare the answering brief prior to the April 15, 2021 deadline.

vii. The Association requests a 30-day extension up to including, April 15, 2021 to file its answering brief. This request is made in good faith and not for delay.

viii. The Association respectfully submits that the complex nature of the issues presented in this case and unprecedented disruptions over the past several months constitute such good cause.

ix. This request is made in good faith and not intended to cause delay or prejudice to any party.

DATED March 12, 2021

LEACH KERN GRUCHOW ANDERSON SONG

/s/ Ryan D. Hastings

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*Attorneys for Respondent Spanish Trail
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CERTIFICATE OF SERVICE

I hereby certify that on this date, March 12, 2021, I submitted the foregoing

RESPONDENT SPANISH TRAIL MASTER ASSOCIATION’S UNOPPOSED MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF for filing and service through the Court’s eFlex electronic filing service.

According to the system, electronic notification will be automatically sent to the following:

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