1	IN THE SUPREME COURT OF THE STATE OF NEVADA		
2		Floatronically Filed	
3	APCO CONSTRUCTION, INC., A NEVADA CORPORATION; AND	Case No. 80177 Electronically Filed D.C. Case No. A73 Elizabeth A. Brown	a.m.
4	SAFECO INSURANCE COMPANY OF AMERICA,	Clerk of Supreme C	
5	Appellants,		
6	VS.		
7	HELIX ELECTRIC OF NEVADA, LLC, A NEVADA LIMITED		
8	LIABILITY COMPANY,		
9	Respondent.		
10	A DDELL A NEC A DCO CONCED	DICTION INC. AND SAFECO	
11	APPELLANTS APCO CONSTRUCTION, INC. AND SAFECO INSURANCE COMPANY OF AMERICA'S MOTION TO EXTEND TIME		
11	TO FILE OPENING BRIEF		
12			
10	SECOND F	REQUEST	
13	EENNEMODE	CDAIC DC	
14	FENNEMORE CRAIG, P.C. John Randall Jefferies, Esq. Nevada Bar No. 3512		
15	Christopher H. Byrd, Esq. Nevada Bar No. 1633 300 South 4th Street, 14 th Floor		
16	Las Vegas, Nevada 89101 Telephone: (702) 692-8000 Facsimile: (702) 692-8099 Email: rjeffries@fclaw.com		
17	Email: rjeffries@fclaw.com cbyrd@fclaw.com		
18	Attorneys for Appellants APCO Construction, Inc. and Safeco Insurance Company of America		
19			

UNOPPOSED MOTION

Pursuant to NRAP 31(b)(3), Appellants APCO Construction, Inc. and Safeco Insurance Company of America, ("APCO/SAFECO") respectfully request an extension of 30 days or until January 6, 2021 to file their Opening Brief ("Brief"). The Brief is currently due January 6, 2021. There has been one prior extension request.

Respondent, Helix Electric of Nevada, LLC Inc. ("HELIX"), by and through its counsel, Cary Domina, Esq., has been informed of the need for additional time and has consented to the requested extension.

This extension is being requested for several reasons. First, the undersigned's spouse continues to deal with medical issues, including a recent surgery just before Thanksgiving to alleviate complications that developed from an earlier surgery. The recent surgery and required care have further impacted counsel's ability to work a full schedule. Second, because of COVID restrictions it has taken Appellants longer than anticipated to organize and compile the documents for a joint appendix in order to provide the same to and obtain approval from Respondent for the joint appendix. Third, as previously indicated, undersigned counsel was retained to file a Petition for Rehearing in APCO Construction, Inc. v. Zitting Brothers Constr., Inc. 136 Nev. Ad. Op. 64,

1	("Zitting Matter"). The Petition for Rehearing in the Zitting Matter was filed
2	November 23, 2020 and was denied by Order filed December 23, 2020.
3	Appellants in in the Zitting Matter are considering a Petition for En Banc
4	Reconsideration, which would be due on January 6, 2021, and therefor requires
5	counsel's immediate attention. Lastly, a portion of counsel's time has been
6	spent on the answering brief in the matter of Helix Electric of Nevada, LLC v.
7	APCO Construction, Inc. in case number 77320. The answering brief in that
8	matter is due February 4, 2021.
9	CONCLUSION
10	Based on the foregoing, APCO/SAFECO respectfully requests that the
11	Court extend time for Appellants to file their Opening Brief to February 5, 2021.
12	DATED this 30th day of December, 2020.

FENNEMORE CRAIG, P.C.

/s/ Christopher H. Byrd
John Randall Jefferies, Esq.
Nevada Bar No. 3512
Christopher H. Byrd, Esq.
Nevada Bar No. 1633
Attorneys for Appellants APCO
Construction, Inc. and Safeco
Insurance Company of America

CERTIFICATE OF SERVICE 1 2 I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 30th day of December, 2020 and was served on 3 the following by the Supreme Court Electronic Filing System (eFlex): 4 5 Cary B. Domina, Esq. Ronald J. Cox, Esq. Jeremy Holmes, Esq. 6 PEEL BRIMLEY LLP 3333 E. Serene Avenue Suite 200 7 Henderson, NV 89074 Telephone: (702) 990-7272; 8 Facsimile: (702) 990-7273 E-mail: cdomina@peelbrimley.com 9 rcox@peelbrimley.com jholmes@peelbrimley.com 10 Attorneys for Helix Electric of Nevada, LLC 11 12 13 /s/Trista Day An employee of Fennemore Craig P.C. 14 15 16 17 18

19