

1                   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2                   APCO CONSTRUCTION, INC., A  
3                   NEVADA CORPORATION; AND  
4                   SAFECO INSURANCE COMPANY  
                    OF AMERICA,

5                   Appellants,

6                   vs.

7                   HELIX ELECTRIC OF NEVADA,  
8                   LLC, A NEVADA LIMITED  
                    LIABILITY COMPANY,

9                   Respondent.

Case No. 80177  
D.C. Case No. A730091

Electronically Filed  
Jul 14 2021 12:12 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

10                   **APPELLANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE**  
11                   **REPLY BRIEF**

12                   **(FIRST REQUEST)**

13                   **FENNEMORE CRAIG, P.C.**

14                   John Randall Jefferies, Esq.

                    Nevada Bar No. 3512

                    Christopher H. Byrd, Esq.

                    Nevada Bar No. 1633

15                   300 South 4th Street, 14<sup>th</sup> Floor

                    Las Vegas, Nevada 89101

16                   Telephone: (702) 692-8000 Facsimile: (702) 692-8099

                    Email: rjeffries@fclaw.com

                    cbyrd@fclaw.com

17                   *Attorneys for Appellants APCO Construction, Inc.*  
18                   *and Safeco Insurance Company of America*  
19

1 **UNOPPOSED MOTION**

2 Pursuant to NRAP 31(b)(2) and (3), Appellants APCO Construction, Inc.  
3 and Safeco Insurance Company of America (“Appellants”) respectfully request  
4 an extension for thirty (30) days to file Appellant’s Reply Brief (“Brief”). The  
5 Brief is now due July 15, 2021. The extension would make the brief due on  
6 August 16, 2021.

7 Respondent, Helix Electric of Nevada, LLC (“Helix”), by and through its  
8 counsel, Cary B. Domina, Esq., has consented to the requested extension.

9 This extension is being requested because the undersigned’s wife  
10 experienced complications from a series of surgeries, which resulted in yet  
11 another surgery on June 9, 2021. During the recovery period, which is estimated  
12 to last for another 2 to 4 weeks, the undersigned has been and is solely  
13 responsible for making sure that the daily needs of his spouse are met. All of  
14 this limits undersigned’s work schedule, causes frequent interruptions at work,  
15 and affects undersigned’s focus. As a result, it has taken longer than usual to  
16 research and prepare the Brief in this matter.

17 ///

18  
19 ///

1 **CONCLUSION**

2 Based on the foregoing, Appellants respectfully request that the Court  
3 extend the time for Appellants to file their Reply Brief to August 16, 2021.

4 DATED this 14th day of July, 2021.

5 **FENNEMORE CRAIG, P.C.**

6 /s/ Christopher H. Byrd  
7 John Randall Jefferies, Esq.  
8 Nevada Bar No. 3512  
9 Christopher H. Byrd, Esq.  
10 Nevada Bar No. 1633  
11 *Attorneys for Appellants APCO*  
12 *Construction, Inc. and Safeco*  
13 *Insurance Company of America*  
14  
15  
16  
17  
18  
19

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

Cary B. Domina, Esq.  
Ronald J. Cox, Esq.  
Jeremy Holmes, Esq.  
PEEL BRIMLEY LLP  
3333 E. Serene Avenue Suite 200  
Henderson, NV 89074  
Telephone: (702) 990-7272;  
Facsimile: (702) 990-7273  
E-mail: [cdomina@peelbrimley.com](mailto:cdomina@peelbrimley.com)  
[rcox@peelbrimley.com](mailto:rcox@peelbrimley.com)  
[jholmes@peelbrimley.com](mailto:jholmes@peelbrimley.com)  
*Attorneys for Helix Electric of  
Nevada, LLC*

2  
3  
4  
5  
6  
7  
8  
9