

IN THE SUPREME COURT OF THE STATE OF NEVADA

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JOHN S. WALKER, and RALPH
ORTEGA,

Petitioners,

vs.

THE SECOND JUDICIAL DISTRICT
COURT and BARRY L. BRESLOW, as
District Judge,

Respondents.

SHEILA MICHAELS and KATHERYN
FRITTER, real parties in interest.

Electronically Filed
Apr 23 2020 10:41 a.m.
Case No. 80358 Elizabeth A. Brown
Clerk of Supreme Court

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR ANSWER TO
WRIT PETITION
(First Request)

Real parties in interest hereby move for a 30-day extension of time for filing the answer to the writ petition. The answer is presently due for filing on April 28, 2020. Therefore, real parties in interest request an extension until May 28, 2020.

Counsel for real parties in interest contacted counsel for petitioners, who indicated that he does not oppose this extension. And if counsel for petitioners needs a similar extension for his reply, counsel for real parties in interest will not oppose it.

This is an unusual writ proceeding in which petitioners are challenging an order denying motions to strike defense requests for trials de novo after arbitration awards had been rendered. The writ petition deals with two separate district court personal injury cases. The procedural background is somewhat unusual, and the appendix

consists of multiple volumes, all of which need to be studied and analyzed for preparation of the answer.

The undersigned counsel has been working on the answer, while at the same time working on the opening brief in a complicated multimillion-dollar medical malpractice appeal and the reply brief in an unusual premises liability appeal. Deadlines for those briefs needed to be extended due to extremely important personal matters that arose in February for the undersigned counsel.

Additionally, the undersigned counsel has been working almost entirely at home since the Governor issued COVID-19 guidelines in early March, and counsel's law firm has reduced its staff. This has made working on appellate papers more difficult and time consuming. Therefore, counsel will not be able to complete the answer by the current deadline.

Accordingly, real parties in interest request a 30-day extension until May 28, 2020, for the answer. This request is being made in good faith, without the intent to delay this case unnecessarily.

DATED: April 23, 2020

/s/ Robert L. Eisenberg
Robert L. Eisenberg, Esq. (SBN 0950)
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Counsel for real parties in interest

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of LEMONS, GRUNDY & EISENBERG, and on this date, the foregoing was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

William Kendall
Adam McMillen

I further certify that on this date I served a copy of the foregoing by U.S. mail to:

Hon. Barry L. Breslow, District Court Judge
75 Court Street
Department 8
Reno, Nevada 89501

DATED: 23 Apr 2020



Employee of Lemons, Grundy &
Eisenberg