

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

AIRMOTIVE INVESTMENTS, LLC, a  
Nevada Limited Liability Company,

Appellant,

vs.

BANK OF AMERICA, N.A.,

Respondent.

Case No. 80373

Electronically Filed  
Feb 19 2021 11:50 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**UNOPPOSED MOTION FOR TIME EXTENSION FOR  
BANK OF AMERICA, N.A.'S ANSWERING BRIEF**

Respondent Bank of America, N.A. moves the court, pursuant to NRAP 31(b)(3), for a thirty-day time extension to file its answering brief. The requested deadline is March 22, 2021.

Pursuant to NRAP 31(b)(3)(A), Bank of America submits the following information:

- i. The answering brief is currently due on February 19, 2021.
- ii. The parties stipulated to extend the original deadline and set a deadline of February 19, 2021.
- iii. This is Bank of America's first motion request.
- v. No requests for extension of time have been denied.
- vi. Airmotive does not oppose this extension request.

vii. Good cause exists to grant the motion. Bank of America and Airmotive are in active global settlement negotiations. The parties would like additional time to explore settlement rather than consume fees and costs associated with an answering brief and subsequent reply brief. The parties will promptly inform the court should they be successful in reaching a settlement. Moreover, counsel was unable finalize the brief before the current deadline due to the recent staffing changes, other time-sensitive obligations, and circumstances surrounding working remotely due to the pandemic.

vii. BoNYM requests a thirty-day extension up to and including March 22, 2021, to file its answering brief. This request is made in good faith and not for delay.

DATED this 19th day of February, 2021.

**AKERMAN LLP**

/s/ Scott R. Lachman

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**CERTIFICATE OF SERVICE**

I certify that I electronically filed on February 19, 2021, the foregoing **UNOPPOSED MOTION FOR TIME EXTENSION FOR BANK OF AMERICA, N.A.'S ANSWERING BRIEF** with the Clerk of the Court for the Nevada Supreme Court by using the Court's electronic file and serve system. I further certify that all parties of record to this appeal are either registered with the Court's electronic filing system or have consented to electronic service and that electronic service shall be made upon and in accordance with the Court's Master Service List.

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Carla Llarena

An employee of AKERMAN LLP