1	IN THE SUPREME COURT OF	THE STATE OF NEVADA
2	WELVY EVECTORS OF NEWADA	Los Averagos as Electronically Filed
3	HELIX ELECTRIC OF NEVADA, LLC,	Case No. 77320/80 Electronically Filed District Court Case Figure 20, 2021 05:36 p.m.
4	Appellant/Cross-Respondent,	Clerk of Supreme Court
5	VS.	
6	APCO CONSTRUCTION, INC.,	
7	Respondent/Cross-Appellant.	
8	RESPONDENT/CROSS-APPELLAN	T APCO CONSTRUCTION INC 'S
9	UNOPPOSED MOTION TO EXTEND TIME TO FILE CROSS REPLY BRIEF	
10	<u>DKI</u>	<u>ET</u>
11	FENNEMORE	·
12	John Randall Jefferies, Esq. Nevada Bar No. 3512	
13	Christopher H Nevada Bar	r No. 1633
14	300 South 4th St Las Vegas, N	
15	-an Jack Chen N	d- Min Juan, Esq.
16	1	ounteer, Esq. RBACH COFFING
17		k Run Drive s, NV 89145
18	Attorneys for Respondent/Cross-Ap	
19		

UNOPPOSED MOTION

Pursuant to NRAP 31(b)(2) and (3), Respondent/Cross-Appellant APCO Construction, Inc. ("APCO") respectfully requests an extension to June 4, 2021 to file Respondent's Reply Brief on Cross Appeal ("Brief"). The Brief was due May 5, 2021, but was not completed timely because the due date was not properly calendared.

Appellant/Cross-Respondent, Helix Electric of Nevada, LLC ("HELIX"),

Appellant/Cross-Respondent, Helix Electric of Nevada, LLC ("HELIX"), by and through its counsel, Eric B. Zimbleman, Esq., has consented to the requested extension. See the Stipulation to Extend Time attached as **Exhibit** "1".

This extension is being requested because of the calendaring error. The error was discovered on May 20, 2021 when counsel called the Clerk of the Court about an extension. A draft of the brief has been prepared and no further extensions will be required.

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1	CONCLUSION
2	Based on the foregoing, APCO respectfully requests that the Court extend
3	time for Respondent/Cross-Appellant to file its Reply Brief on Cross Appeal to
4	June 4, 2021.
5	DATED this 20 th day of May, 2021.
6	FENNEMORE CRAIG, P.C.
7	/s/ Christopher H. Byrd
8	John Randall Jefferies, Esq. Nevada Bar No. 3512 Christopher H. Byrd, Esq.
9	Christopher H. Byrd, Esq. Nevada Bar No. 1633 Attorneys for Appellants
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1 **CERTIFICATE OF SERVICE** I hereby certify that this document was filed electronically with the 2 Nevada Supreme Court on the 20th day of May, 2021 and was served on the 3 following by the Supreme Court Electronic Filing System (eFlex): 4 5 Eric B. Zimbelman, Esq. Peel Brimley LLP 3333 E. Serene Avenue Suite 200 6 Henderson, NV 89074 Telephone: (702) 990-7272; 7 Facsimile: (702) 990-7273 8 E-mail: ezimbelman@peelbrimley.com Attorneys for Helix Electric of Nevada, LLC 9 Jack Chen Min Juan, Esq. 10 Cody S. Mounteer, Esq. Tom W. Stewart, Esq. Marquis Aurbach Coffing 11 10001 Park Run Drive Las Vegas, NV 89145 12 702-382-0711 Attorneys for Respondent/Cross-Appellant APCO Construction, Inc. 13 14 15 /s/ Trista Day An employee of Fennemore Craig P.C. 16 17 18 19

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EXHIBIT 1

EXHIBIT 1

1	IN THE SUPREME COURT OF THE STATE OF NEVADA	
2		
3	HELIX ELECTRIC OF NEVADA, Case No. 77320/80508 LLC, District Court Case No. A571228	
4	Appellant/Cross-Respondent,	
5	vs.	
6	APCO CONSTRUCTION, INC.,	
7	Respondent/Cross-Appellant.	
8	CENTRAL A TRANSPORT	
9	STIPULATION TO EXTEND TIME FOR RESPONDENT/CROSS- APPELLANT APCO CONSTRUCTION, INC. TO FILE CROSS REPLY	
10	BRIEF	
10		
11	FENNEMORE CRAIG, P.C.	
10	John Randall Jefferies, Esq.	
12	Nevada Bar No. 3512	
13	Christopher H. Byrd, Esq. Nevada Bar No. 1633	
	300 South 4th Street, 14th Floor	
14	Las Vegas, Nevada 89101	
15	-and-	
13	Jack Chen Min Juan, Esq.	
16	Cody S. Mounteer, Esq. MARQUIS AURBACH COFFING	
	10001 Park Run Drive	
17	Las Vegas, NV 89145	
18	Attorneys for Respondent/Cross-Appellant APCO Construction, Inc.	
19		

Respondent/Cross-Appellant APCO CONSTRUCTION, INC., by and through its attorneys Fennemore Craig, P.C. and Appellant/Cross-Respondent HELIX ELECTRIC OF NEVADA, LLC, by and through their attorneys Peel Brimley LLP, hereby stipulate to extend the time for APCO to file its Reply Brief until June 4, 2021.

This stipulation is being made in good faith and not for the purposes of delay.

Dated this 20th day of May, 2021.

Dated this 20th day of May, 2021.

FENNEMORE CRAIG, P.C.

/s/Christopher H. Byrd, Esq.

PEEL BRIMLEY LLP

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