

**In the Supreme Court of Nevada**

PANORAMA TOWERS  
CONDOMINIUM ASSOCIATION,  
Appellant,

*vs.*

LAURENT HALLIER; PANORAMA  
TOWERS I, LLC; PANORAMA  
TOWERS I MEZZ, LLC; and M.J.  
DEAN CONSTRUCTION, INC.,  
Respondents.

Electronically Filed  
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Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME  
TO PETITION FOR REHEARING**

Respondents request a 30-day extension of time, through December 29, 2021, in which to file a petition for rehearing. *See* NRAP 26(b)(1)(A). This is the first such motion for extension. The petition would otherwise be due November 29, 2021. NRAP 40(a), (b)(2).

Good cause warrants the additional time. The Court's decision in this case rests largely on the precedent of the Court's opinion in *Dekker / Perich / Sabatini Ltd. v. Eighth Judicial Dist. Court*, 137 Adv., Op. 53, 495 P.3d 519 (2021), in which the Court held that NRS 11.202's amended statute of repose applies retroactively. While the briefs in this case addressed the merits of that issue extensively, the Court's decision

assumes the proposition as a result of the opinion in *Dekker / Perich / Sabatini Ltd.*

On November 29, 2021, the petitioners in *Dekker / Perich / Sabatini Ltd.* petitioned this Court for *en banc* reconsideration. See Doc. # 2021-33961. In light of the close relationship between that case and this one, respondents here wish to see that case finally resolved by the *en banc* court before determining its application in this appeal. If the opinion in that case is vacated, the decision in this case predicated upon it must be reevaluated, as well. To enable that contingency, respondents move for a 30-day extension of time in which to file any petition for rehearing.

Even apart from the *Dekker / Perick / Sabatini Ltd.* case, the issues in this appeal are complex and deserve careful consideration, including the argument—not addressed in the Court’s opinion—that the Legislature lacks the power to commandeer the judiciary and alter a judgment by enacting a law that takes effect after the judgment’s entry.

In addition, respondents’ appellate counsel has had to take significant time away from this matter to deal with medical issues involving counsel’s newborn son. The attorneys who ordinarily would

have worked on this petition have been under extraordinary pressures dealing with a trial which unexpectedly has continued past the Thanksgiving holiday.

Dated this 29th day of November, 2021.

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## CERTIFICATE OF SERVICE

I certify that on November 29, 2021, I submitted the foregoing “Motion for Extension of Time to Petition for Rehearing” for filing via the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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