

**IN THE SUPREME COURT OF NEVADA**

PANORAMA TOWERS CONDOMINIUM  
UNIT OWNERS' ASSOCIATION, a Nevada  
non-profit corporation,

Appellant,

vs.

LAURENT HALLIER, an individual;  
PANORAMA TOWERS I, LLC, a Nevada  
limited liability company; PANORAMA  
TOWERS I MEZZ, LLC, a Nevada limited  
liability company; and M.J. DEAN  
CONSTRUCTION, INC., a Nevada  
corporation,

Respondents.

Electronically Filed  
Dec 06 2021 12:20 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**APPELLANT'S RESPONSE TO RESPONDENTS' MOTION  
FOR EXTENSION OF TIME TO PETITION FOR REHEARING**

Appellant does not object to Respondents' Motion to the extent it is based on counsels' family and professional obligations. However, Appellant disagrees with Respondents' remaining grounds for the extension request, including but not limited to the published decision in *Dekker / Perich / Sabatini Ltd. v. Eighth Judicial Dist. Court*, 137 Adv., Op. 53, 495 P.3d 519 (2021). Appellant reserves its comments on those issues and will respond if this Court orders an answer to the petition for rehearing.

DATED: December 6, 2021.

KEMP JONES, LLP

/s/ Michael J. Gayan

MICHAEL J. GAYAN (#11135)

JOSHUA D. CARLSON (#11781)

3800 Howard Hughes Pkwy, 17<sup>th</sup> Fl.

Las Vegas, Nevada 89169

(702) 385-6000

FRANCIS I. LYNCH (#4145)

Lynch & Associates Law Group

1445 American Pacific Drive, Ste 110 #293

Henderson, NV 89074

SCOTT WILLIAMS (*pro hac vice*)

Williams & Gumbiner, LLP

1010 B Street, Ste 200

San Rafael, CA 94901

*Attorneys for Appellant*

**CERTIFICATE OF SERVICE**

I certify that on the 6th day of December, 2021, I caused to be served via the District Court's e-filing system and pursuant to NRAP 25(b) and NEFCR 9, and electronically filed the foregoing **Appellant's Response to Respondents' Motion for Extension of Time to Petition for Rehearing** with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-filing system (Eflex). Participants in the case who are registered Eflex users will be served by the Eflex system as follows:

Peter C. Brown  
Jeffrey W. Saab  
Devin R. Gifford  
BREMER WHYTE BROWN & O'MERA LLP  
1160 N. Town Center Drive  
Las Vegas, Nevada 89144

Daniel F. Polsenberg  
Joel D. Henriod  
Abraham G. Smith  
LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway #600  
Las Vegas, Nevada 89169

*Counsel for Respondents*

/s/ Pamela Montgomery  
An employee of Kemp Jones, LLP