## Case No. 80615

## 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 Dec 29 2021 07:48 p.m. 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 January 28, 2022, in which to file a petition for rehearing. *See* NRAP 26(b)(1)(A). This is the second such motion. The original deadline of November 29 petition was extended to December 29, 2021.

On top of the ordinary press and staffing shortages associated with the holiday season, multiple appellate counsel and staff are either ill (non-COVID) or are isolating following exposure to a COVID-positive individual. In addition, the attorney tasked with finalizing the petition has been unable to devote much time to work on this or any of his other cases because of needing to care for his ill wife and five-year-old

daughter, along with assisting in the care for their three-month-old son.

This attorney had to cancel the family's other holiday plans.

Notwithstanding these exigencies and the unavailability of other Nevada attorneys, counsel reached out to an attorney in another office to prepare a draft of the petition. Respondents' Nevada counsel are still in the process of reviewing and revising the petition. They sincerely hope to file before the requested extended deadline, however. Respondents have tried to exercise care in explaining the unusual procedural history of this appeal, including the intervening decision in Dekker / Perich / Sabatini Ltd. v. Eighth Judicial Dist. Court, 137 Adv., Op. 53, 495 P.3d 519 (2021), in which respondents also plan to appear amicus in the petition for en banc reconsideration.

Dated this 29th day of December, 2021.

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## CERTIFICATE OF SERVICE

I certify that on December 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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