

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.

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Elizabeth A. Brown
Clerk of Supreme Court

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

Appellant takes no position on whether the Court should grant or deny Respondents' Motion for a second 30-day extension to file a petition for rehearing. However, if the Court is inclined to grant the requested extension, Appellant requests this be the last extension provided to Respondents.

If granted, Respondents will have delayed remittitur by approximately seven (7) months with serial extension requests. Beginning on October 21, 2020, Respondents filed four requests to extend the time to file their Answering Brief for

similar stated reasons. The Court denied the fourth extension request giving Respondents until March 12, 2021, to file their Answering Brief.

Consistent with their pattern and practice, Respondents have now sought multiple extensions to file a petition for rehearing. Appellant is sympathetic to counsel's stated challenges. However, at some point, Respondents—which are represented by two large law firms—should adequately staff this case to complete work in a timely fashion. Appellant initiated this claim in February 2016. Having prevailed on appeal nearly six (6) years later, Appellant should be allowed to move forward with its claims on the merits without unreasonable delay.

Moreover, Respondents' newest extension request appears related to their request to file an amicus brief in support of the petition for en banc reconsideration in *Dekker / Perich / Sabatini Ltd. v. Eighth Judicial Dist. Court* (Case No. 81459), which is due January 5, 2022—a week after Respondents' first extension to file a petition for rehearing in this appeal. Respondents' decision to voluntarily participate in the *Dekker* proceeding should not prejudice Appellant via avoidable delay in this matter. The *Dekker* court already denied a petition for rehearing.

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DATED: January 5, 2022

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CERTIFICATE OF SERVICE

I certify that on the 5th day of January, 2022, 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:

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