

IN THE SUPREME COURT OF THE STATE OF NEVADA

CAPRIATI CONSTRUCTION
CORP., INC., a Nevada corporation,

Appellant,

vs.

BAHRAM YAHYAVI, an individual,

Respondent.

Electronically Filed
Case No. 80107 Nov 12 2020 05:24 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CAPRIATI CONSTRUCTION
CORP., INC., a Nevada corporation,

Appellant,

vs.

BAHRAM YAHYAVI, an individual,

Respondent.

Case No. 80821

**RESPONDENT BAHRAM YAHYAVI'S MOTION FOR EXTENSION
OF TIME TO FILE ANSWERING BRIEF**

Respondent Bahram Yahyavi, by and through his counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, hereby moves to extend the time to file his Answering Brief by thirteen (13) days, up to and including Wednesday, November 25, 2020, pursuant to NRAP 31(b)(3). The parties previously stipulated to a thirty (30) day extension on

September 10, 2020, which was approved by this Court. On October 22, 2020, this Court granted Respondent's Motion for Extension of Time to File Answering Brief. Respondent's Answering Brief is currently due on October 12, 2020. This is Respondent's third request for an extension. This Court has not previously denied any requests for extensions of time to file briefing in this matter.

An additional, brief extension of time has become necessary for Respondent's counsel to finalize his Answering Brief before submission. Within the last week, the undersigned counsel became ill and suffered symptoms consistent with exposure to COVID-19. Out of an abundance of caution, counsel underwent a test to rule out his transmission of the virus. In addition, lead appellate counsel unexpectedly had to prepare for two (2) critical motion hearings last week in matters pending before the United States District Court styled as *Sanchez v. Windhaven National Ins. Co., et al.*, Case No. 2:19-cv-02196-RFB-VCF and *Arlitz, et al. v. GEICO Casualty Company*, Case No. 2:19-cv-00743-RFB-DJA. Lead appellate counsel first received notice of the hearings on Sunday November 1, 2020.

To ensure the brief is finalized and clear for this Court to consider, Respondent must respectfully request this Court to approve a brief two-week extension to submit the answering brief no later than Wednesday,

November 25, 2020. This request is made in good faith and not for the purpose of undue delay in the resolution of this matter.

DATED this 12th day of November, 2020

Respectfully Submitted,

PRINCE LAW GROUP

/s/ Kevin T. Strong
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Supreme Court of Nevada on the 12th day of November, 2020. Electronic service of the foregoing document entitled **RESPONDENT BAHRAM YAHYAVI'S MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** shall be made in accordance with the Master

Service List as follows:

Michael K. Wall
HUTCHISON & STEFFEN, PLLC
10080 West Alta Drive, Suite 200
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Attorney for Appellant
Capriati Construction Corp., Inc.

/s/ Kevin T. Strong _____
An Employee of PRINCE LAW GROUP