IN THE SUPREME COURT OF THE STATE OF NEVADA

RALPH STEPHEN COPPOLA, TRUSTEE OF THE R.S. COPPOLA TRUST DATED OCTOBER 19, 1995 AS MOST RECENTLY AMENDED ON SEPTEMBER 13, 2001,

Appellant,

vs. WELLS FARGO BANK, N.A.,

Respondent.

Electronically Filed Sep 30 2021 03:49 p.m. Supreme Court Casizabets 10.0Brown Clerk of Supreme Court District Court Case No. CV1801272

APPEAL From the Second Judicial District Court The Honorable Kathleen Drakulich

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF (SECOND REQUEST BY MOTION)

Andrew M. Jacobs (Nevada Bar No. 12787) Kelly H. Dove (Nevada Bar No. 10569) SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Facsimile: (702) 784-5252 <u>ajacobs@swlaw.com</u> <u>kdove@swlaw.com</u> Attorneys for Respondent Wells Fargo Bank, N.A. Respondent Wells Fargo Bank, N.A., by and through its counsel, Snell & Wilmer L.L.P., moves for an additional 7-day extension of time in which to file its answering brief. Based on a pending motion to extend, that brief is currently due for filing on September 29, 2021, following a 14-day extension pursuant to NRAP 26(b)(1)(B) and subsequent, pending unopposed request for a 21-day extension. Respondent respectfully requests an additional brief extension until <u>October 6, 2021</u>, pursuant to NRAP 27 and NRAP 31.

The extension is necessitated by recent "bet the company" emergency motion practice in a federal circuit court of appeals, combined with absences and FMLA leave in the litigation team. Undersigned counsel has exercised diligence and has drafted the brief. The additional time is needed to allow for adequate time for client review. For that reason, counsel does not anticipate needing any further additional time. Further, Appellant's counsel has represented that they do not oppose this request. Based upon the foregoing, Respondent respectfully requests that the Court grant its motion, allowing until October 6, 2021, to file its answering brief. Because this extension is not sought for the purpose of delay or any improper purpose, and Appellant's counsel consents to the extension, Wells Fargo respectfully requests that the Court grant the modest additional extension.

Dated: September 29, 2021 SNELL & WILMER L.L.P.

/s/ Kelly H. Dove ANDREW M. JACOBS Nevada Bar No. 12787 KELLY H. DOVE Nevada Bar No. 10569 SNELL & WILMER L.L.P. 3883 Howard Hughes Pkwy., Ste. 1100 Las Vegas, NV 89169

Attorneys for Respondent

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On September 29, 2021, I caused to be served a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF (SECOND REQUEST BY MOTION)** by the method indicated:

BY ELECTRONIC SUBMISSION: submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

> <u>/s/ Kelly H. Dove</u> An Employee of Snell & Wilmer L.L.P.

4848-5382-8090