

IN THE SUPREME COURT OF THE STATE OF NEVADA

RUTH COHEN, an individual,)	
)	
Appellant/Cross-Respondent,)	Supreme Court Case No. 81018
)	(Consolidated with Supreme Court Case No. 81172)
)	No. 81172)
v.)	Elizabeth A. Brown
)	Clerk of Supreme Court
)	
)	On appeal from District Court Case
)	No. A-19-792599-B
PAUL PADDA, et al.)	
)	
Respondents/Cross-Appellants.)	
)	

**JOINT MOTION FOR AN EXTENSION OF TIME TO FILE
ANSWERING BRIEFS**

Pursuant to Nevada Rule of Appellate Procedure 31(b)(3), Appellant/Cross-Respondent Ruth L. Cohen (“Ms. Cohen”), by and through her undersigned attorneys of record, and Respondents/Cross-Appellants Paul S. Padda, Esq. (“Mr. Padda”) and Paul Padda Law, PLLC (“Padda Law”) (collectively, the “Padda Parties”), by and through their undersigned attorneys of record, hereby move this Court as follows:

1. Supreme Court Case No. 81018 and Supreme Court Case No. 81172 were consolidated on August 11, 2020 with parallel briefing schedules.
2. The parties filed their respective Opening Briefs on December 9, 2020.
3. According to Nevada Rule of Appellate Procedure 31(a)(1)(B), the parties’ respective Answering Briefs were originally due on January 8,

2021.

4. On or about December 22, 2020, the parties filed a stipulation pursuant to NRAP 26(b)(2) to extend the time to file their respective Answering Briefs to February 8, 2021. This was the parties' first stipulation to extend time to serve their Answering Briefs.
5. The parties' stipulation was granted.
6. On or about December 29, 2020, the Padda Parties experienced turnover on their legal team with several attorneys exiting and one attorney, Mr. Padda himself, entering the case.
7. Moreover, in December 2020, Mr. Padda tested positive for COVID-19 and experienced symptoms caused by the novel coronavirus.
8. Since his recovery, Mr. Padda has experienced lingering, long-haul style symptoms caused by his COVID-19 infection that have limited his ability to work with the rest of the legal team on the Answering Brief.
9. Mr. Padda's lingering symptoms have, consequently, delayed the Padda Parties' preparation of their Answering Brief.
10. The Padda Parties engaged Ms. Cohen, through counsel, about seeking an additional extension of time to file their respective Answering Briefs due to the turnover on their legal team and Mr.

Padda's lingering symptoms. Ms. Cohen, through counsel, agreed to a thirty (30) day extension of time to file the parties' respective Answering Briefs.

11. Therefore, based on the grounds specified in Paragraphs 6 through 9 *supra*, the parties respectfully move this Court for an order pursuant to NRAP 31(b)(3) to extend the time for filing their respective Answering Briefs in this matter by thirty (30) days, up to and including March 10, 2021.

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12. This is the parties' first motion under NRAP 31(b)(3) for an extension of time to file their Answering Briefs and second total request for an extension of time for filing their Answering Briefs, including their December 22, 2020 stipulation pursuant to NRAP 26(b)(2).

DATED this 29th day of January, 2021.

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