## Case No. 81220

## In the Supreme Court of Nevada

Electronically Filed Jul 27 2020 09:26 a.m. Elizabeth A. Brown Clerk of Supreme Court  District Court Case No. A760779
) ) ) )

## MOTION FOR EXTENSION TO FILE ANSWER

Real party in interest Baker Boyer National Bank requests an extension of 30 days through August 26, 2020 to file its answer. NRAP 31(b)(3). This is the second such request. The brief was original due June 25, 2020 and, without an extension, would be due July 27, 2020.

Additional time is needed for a couple of reasons. First, counsel had to take time away from the brief to care for his wife, who became ill and had to seek medical attention. Counsel also had to be the primary caretaker of his children during his spouse's recovery. Second, difficulties from the COVID-19 outbreak still persist. Capacity and

efficiency of remote working increases, but technology challenges have caused slower output. Counsel is working diligently to streamline the arguments for this Court. The Court's understanding in light of these unpredictable circumstances is appreciated.

Dated this 27th day of July, 2020.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: <u>/s/ John E. Bragonje</u>
DANIEL F. POLSENBERG (SBN 2376)
JOHN E. BRAGONJE (SBN 9519)
ABRAHAM G. SMITH (SBN 13,250)
3993 Howard Hughes Parkway
Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Real Party in Interest

## **CERTIFICATE OF SERVICE**

I certify that on July 27, 2020, I submitted the foregoing "Motion for Extension to File Answer" for filing *via* the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

Mark A. Hutchison Michael K. Wall Brenoch Wirthlin HUTCHISON & STEFFEN 10080 W. Alta Drive, Suite 200 Las Vegas, Nevada 89145

Attorneys for Petitioner

/s/ Jessie M. Helm An Employee of Lewis Roca Rothgerber Christie LLP