

In the Supreme Court of Nevada

ST. PAUL FIRE & MARINE
INSURANCE COMPANY,
Appellant,

vs.

ASPEN SPECIALTY INSURANCE
COMPANY; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH,
PA.; and ROOF DECK ENTERTAINMENT,
LLC d/b/a MARQUEE NIGHTCLUB,
Respondents.

Electronically Filed
Apr 30 2021 03:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME
TO FILE ANSWERING BRIEF**

Respondents request an extension through June 1, 2021 to file the answering brief. NRAP 31(b)(3). This is the first such motion. The brief was originally due March 31, 2021, and the parties stipulated to an extension through April 30, 2021.

Counsel for appellant communicated to respondents' counsel that appellant does not oppose this request. His professional courtesy is sincerely appreciated.

Good cause exists for the extension. One of respondents' attorneys had to take time off work to care for his wife, who is suffering from an unusually difficult pregnancy, and his sick child. The pregnancy has

made it difficult in general for counsel's family and for caring for their child. Counsel have also experienced staff shortages, in part due to complications from COVID-19 vaccination.

In addition to these medical reasons, counsel are experiencing extraordinary demands on their schedule. On top of their ordinary workload, including hearings, briefs, and mediations, counsel have been involved in a bench trial that has now extended over eleven days since early March and is still ongoing. Lead appellate counsel Dan Polsenberg is also preparing for two Supreme Court oral arguments on May 12.

Respondents also note that the brief they are answering is extraordinarily complex, exceeds the word limit, and was prepared with the benefit of multiple extensions. This extension is necessary to give respondents an opportunity to review the brief, once the draft is complete.

Dated this 30th day of April, 2021.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2021, I submitted the foregoing
“**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF**”
for filing via the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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