#### Case No. 81344

### 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 May 28 2021 04:21 p.m. Elizabeth A. Brown Clerk of Supreme Court

# UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF

Respondents National Union Fire Insurance Company of Pittsburgh, PA. and Roof Deck Entertainment, LLC d/b/a Marquee Night-club request an extension through July 1, 2021 to file the answering brief. NRAP 31(b)(3). This is the second such motion. The brief was extended once by stipulation and then by motion through June 1, 2021.

Appellant does not oppose the request. That professional courtesy is sincerely appreciated.

The requested extension is necessary. The attorney primarily responsible for drafting the brief has had to take time away dealing with a family emergency due a serious complication in his wife's pregnancy.

Unfortunately, this medical issue is likely to require the attorney to take over much of the responsibilities at home for the latter part of the pregnancy, so it may take time for counsel to either find another individual to work on the matter or for that attorney to find time to prepare the brief. Lead appellate counsel has also been unable in the meantime to devote significant time to this appeal because of the press of preparing for two Supreme Court arguments on the same day earlier this month.

We appreciate the Court's understanding in these extraordinary circumstances.

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## Dated this 28th day of May, 2021.

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## **CERTIFICATE OF SERVICE**

I certify that on May 28, 2021, I submitted the foregoing "Unopposed 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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