

IN THE SUPREME COURT OF THE STATE OF NEVADA

ST. PAUL FIRE & MARINE
INSURANCE COMPANY

Appellant,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.;
ROOF DECK ENTERTAINMENT, LLC,
D/B/A MARQUEE NIGHTCLUB,

Respondents.

Supreme Court No: 81344

District Court Case No: A758902

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Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT ST. PAUL FIRE &
MARINE INSURANCE
COMPANY'S MOTION FOR AN
EXTENSION OF TIME TO FILE
REPLY BRIEF
(FIRST REQUEST)**

Appellant St. Paul Fire & Marine Insurance Company respectfully moves this Court for an extension of time for a period of 90 days from the current due date within which to file its reply brief. The reply brief is presently due to be filed on or before September 1, 2021. This extension of time would make the reply brief due on or before November 30, 2021. This is respondents first request for an extension of time.

On July 20, 2021, appellate counsel for appellant, Michael K. Wall, of Hutchison & Steffen passed away after his short battle with COVID-19. As a result, the underlying matter as well as several other matters needed to be reviewed and assigned to other attorneys within the firm. This has not given the undersigned counsel sufficient time to complete the complex task of a Supreme Court reply brief.

On August 23, 2021, appellate counsel for appellant spoke with appellate counsel for respondent, Abraham Smith, who graciously agreed to the 90-day extension request for appellant to file its reply brief.

An additional 90-day extension is sought. This request is presented in good faith, and not for purposes of delay or any other improper reason.

DATED this 24th day of August, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Daniel H. Stewart

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CERTIFICATE OF SERVICE

I certify that I am an employee of HUTCHISON & STEFFEN, PLLC and that on the 24th day of August, 2021 the foregoing **APPELLANT ST. PAUL FIRE & MARINE INSURANCE COMPANY'S MOTION FOR AN EXTENSION OF TIME TO FILE REPLY BRIEF (FIRST REQUEST)** was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list below.

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