

In the Supreme Court of Nevada

ST. PAUL FIRE & MARINE
INSURANCE COMPANY,
Appellant,

vs.

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

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Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME
TO ANSWER PETITION FOR REHEARING**

Respondents National Union Fire Insurance Company of Pittsburgh, PA and Roof Deck Entertainment LLC d/b/a Marquee Nightclub request a 30-day extension through February 11, 2023, in which to file their answer to appellant's petition. NRAP 26(b)(1)(A)). This is the first request. The current deadline is January 12, 2023.

Undersigned counsel conferred with counsel for St. Paul, who made no promises but believed it unlikely that St. Paul would oppose a reasonable request.

Good cause warrants the extension. Counsel needs adequate time to prepare the answer. The order directing answer to the petition for

rehearing was signed on December 29, 2022, while undersigned counsel was out-of-state for the holidays. Counsel have only recently been able to communicate with their client regarding the answer to the petition and need an adequate opportunity to address the arguments raised in the petition—particularly the appeal that this Court adopt California law and the debate about what California law actually prescribes.

In addition, beyond ordinary caseload concerns, undersigned counsel have to respond in a separate case where they have been sued by an opposing party and his counsel based on a decade's worth of litigation in another matter. The preparation of those responses is unusually time-consuming and has detracted from counsel's ability to address this rehearing petition.

Dated this 11th day of January, 2023.

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CERTIFICATE OF SERVICE

I certify that on January 11, 2023, I submitted the foregoing
“*Motion for Extension of Time to Answer Petition for Rehearing*” for fil-
ing *via* the Court’s eFlex electronic filing system. Electronic notification
will be sent to the following:

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