Case No. 81344

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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MOTION FOR EXTENSION OF TIME TO ANSWER PETITION FOR REHEARING

Respondents National Union Fire Insurance Company of Pittsburg, PA and Roof Deck Entertainment LLC d/b/a Marquee Nightclub request a 30-day extension through March 15, 2023, in which to file their answer to appellant's petition. NRAP 26(b)(1)(A)). This is the second request. The original deadline of January 12, 2023 was extended to February 13, 2023.

Good cause necessitates the extension. The answer requires close coordination among appellate counsel, trial counsel, and their clients.

Counsel have prepared a draft of the answer, but lead appellate counsel needs additional time to review and comment following his return after

the recent birth of his grandchild, for which he had to take a leave of absence. In addition, one of respondent's other attorneys who led the proceedings in the trial court has been unable to comment. Finally, the draft substantially exceeds the word limit. Although respondents may still ultimately seek leave to exceed the word limit, additional time will allow counsel to edit for concision.

Counsel will make every effort to file within this requested extension. This Court's courtesy is appreciated.

Dated this 13th day of February, 2023.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Abraham G. Smith

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CERTIFICATE OF SERVICE

I certify that on February 13, 2023, I submitted the foregoing "Motion for Extension of Time to Answer Petition for Rehearing" for filing via the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

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