

In the Supreme Court of Nevada

TRUDI LEE LYTLE and JOHN ALLEN
LYTLE, as trustees of the Lytle
Trust,

Appellants,

vs.

SEPTEMBER TRUST, DATED MARCH
23, 1972; GERRY R. ZOBRIST AND
JOLIN G. ZOBRIST, as trustees of the
GERRY R. ZOBRIST AND JOLIN G.
ZOBRIST FAMILY TRUST; RAYNALDO
G. SANDOVAL AND JULIE MARIE
SANDOVAL GEGEN, as Trustees of
the RAYNALDO G. AND EVELYN A.
SANDOVAL JOINT LIVING AND
DEVOLUTION TRUST DATED MAY 27,
1992; DENNIS A. GEGEN AND JULIE
S. GEGEN, husband and wife, as
joint tenants,

Respondents.

Electronically Filed
Feb 03 2021 10:41 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**UNOPPOSED MOTION FOR EXTENSION
TO FILE OPENING BRIEF AND APPENDIX**

Appellants Trudi Lee Lytle and John Allen Lytle, as trustees of the Lytle Trust, request an extension of 30 days, through March 5, 2021, to file their opening brief and appendix. Without this extension, the brief would be due on February 3, 2021. The deadline previously was extended twice pursuant to NRAP 31(b)(3). The parties also stipulated to extend the deadline under NRAP 31(b)(2) from its original

date of November 2, 2020. No requests for extension have been denied or denied in part.

A series of highly unusual events combined to put completion of the brief behind schedule. First, after appellate counsel Joel Henriod's father passed away in December, he had to dedicate an unforeseeably massive amount of time facilitating the memorial and burial services (on January 20) because his siblings were unable to assist for various reasons. Second, the time necessary to manage his father's affairs after death has been abnormally extensive due partly to Covid-19 related delays and backlogs at banks, the Department of Motor Vehicles, and other institutions. Third, he has had to oversee the relocation of his mother to a different assisted-living facility. Finally, other attorneys in his firm to whom he normally would delegate have been occupied with litigation emergencies in other cases.

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Undersigned counsel has conferred with respondents' counsel, Wesley Smith, who indicated that this motion will not be opposed. That courtesy is appreciated.

Dated this 3rd day of February, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Joel D. Henriod

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and John Allen Lytle, as Trustees of the
Lytle Trust*

CERTIFICATE OF SERVICE

I certify that on February 3, 2021, I submitted the foregoing
“Unopposed Motion for Extension to File Opening Brief and Appendix”
for filing *via* the Court’s eFlex electronic filing system. Electronic
notification will be sent to the following:

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