

**In the Supreme Court of Nevada**

TRUDI LEE LYTLE AND JOHN ALLEN  
LYTLE, 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; and DENNIS A. GEGEN and  
JULIE S. GEGEN, husband and wife,  
as joint tenants; ROBERT Z. DISMAN;  
and YVONNE A. DISMAN,

Respondents.

Electronically Filed  
Aug 27 2021 06:16 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION TO FILE REPLY BRIEF**

Appellants Trudi Lee Lytle and John Allen Lytle, as trustees of the Lytle Trust, move to extend the deadline for filing the reply brief by one week, up to and including, September 3, 2021. NRAP 31(b)(3).

This is the second motion for extension on this brief pursuant to NRAP 31(b)(3), following a stipulated extension under NRAP 31(b)(2). The

brief originally was due June 28, 2021, and without an extension, would be due August 27, 2021. No extensions have been denied or denied in part.

This request arises out of extraordinary circumstances and extreme need. First, undersigned appellate counsel have been stretched extraordinarily thin with two simultaneous jury trials. In one of those trials, a lengthy wrongful-death case, appellate counsel unexpectedly had to play a far larger role than anticipated partly because of issues relating to lead trial counsel's potential disqualification. This was in addition to counsel's already taxing schedule, with hearings in other cases conducted during the trial and having to assist in several others involving motions or orders for case-concluding sanctions. Then, as the trial was ending last week, three individuals involved in the case tested positive for COVID-19. Because those individuals (two attorneys and a client) had spent considerable time around the Lewis Roca offices, administrative matters and precautionary measures required by CDC guidelines drained time away from completing the brief. Second, another attorney has had to transfer his parents between assisted-living facilities.

Despite the circumstances above, the brief is nearly complete. Counsel will make every effort to finalize the brief and procure client approval within the requested one-week extension.

Dated this 27<sup>th</sup> day of August 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Joel D. Henriod

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## CERTIFICATE OF SERVICE

I certify that on August 27, 2021, I submitted the foregoing  
“Motion for Extension to File Reply Brief” for filing *via* the Court’s eFlex  
electronic filing system. Electronic notification will be sent to the  
following:

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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*

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