

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
Jun 14 2021 03:52 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

Appellants Trudi Lee Lytle and John Allen Lytle, as trustee of the Lytle Trust, request to extend the deadline for filing the opening brief and appendix by 60 days, until August 13, 2021. NRAP 31(b)(3). This is the first request to extend the deadline for this brief since the Court reinstated briefing on May 13, 2021 (doc. 21-13837), following remand of jurisdiction to the district court to change its justifications for the

subject order on appeal.¹ The brief otherwise would be due June 14, 2021.

The extension is necessary due to extraordinary circumstances. Undersigned counsel has had to dedicate nearly 100 hours over the last month to assisting his elderly mother in several respects, including monitoring and advising in medical care with her power of attorney, and overseeing relocation to a new residence after appropriate renovations to the property. The situation became much more complex and time-consuming along the way unforeseeably. Because of that mission creep, undersigned counsel had not asked another attorney to draft the brief in his place.

Counsel appreciate this Court's courtesy and stand prepared to reciprocate the courtesy to respondents' counsel for their answering brief should similar extensions be necessary.

Dated this 14th day of June, 2021.

¹ Before the subject order was amended, the parties had stipulated under NRAP 31(b)(2) to extend the deadline for the opening brief (doc. 20-46972) in light of respondents' then-pending motion for remand (doc. 20-46338).

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CERTIFICATE OF SERVICE

I certify that on June 14, 2021, I submitted the foregoing “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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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*

/s/ Emily D. Kapolnai

An Employee of Lewis Roca Rothgerber
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