

IN THE SUPREME COURT OF THE STATE OF NEVADA

MAIDE, L.L.C. A NEVADA
LIMITED-LIABILITY COMPANY,
D/B/A GENTLE SPRING CARE
HOME; SOKHENA K. HUCH, AN
INDIVIDUAL; AND MIKI N. TON,
AN INDIVIDUAL,

Appellants,

vs.

CORINNE R. DILEO, AS
SPECIAL ADMINISTRATOR
FOR THE ESTATE OF THOMAS
DILEO; THOMAS DILEO, JR., AS
STATUTORY HEIR TO THOMAS
DILEO; AND CINDY DILEO, AS
STATUTORY HEIR TO THOMAS
DILEO,

Respondents.

Case No. 81804

Electronically Filed
Mar 31 2021 01:46 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
LEAVE TO FILE AMICUS BRIEF OF
THE NEVADA JUSTICE ASSOCIATION**
(First Request)

The Nevada Justice Association (“NJA”), a proposed *amicus curiae*, is a non-profit organization of independent lawyers in the State of Nevada. NJA is represented in this matter by Micah S. Echols, Esq. of Claggett & Sykes; and A.J. Sharp, Esq. of Sharp Law Center, respectfully

moves this Honorable Court, pursuant to NRAP 26 for an extension of 30 days from the Court's Order in which to file its motion for leave to file an amicus brief and the proposed amicus brief.

Under this Court's rules, a non-governmental amicus curiae "may file a brief only by leave of court granted on motion or the court's request or if accompanied by written consent of all parties." *See* NRAP 29(a). Both the proposed amicus brief and the motion for leave must be filed within seven days of the brief of the party being supported. *See* NRAP 29(f). However, [t]he court may grant leave for later filing, specifying the time within which the opposing party may answer." *Id.*

Here, Respondents, Corinne DiLeo, Thomas DiLeo, Jr., and Cindy DiLeo, filed their answering brief on March 26, 2021. Thus, NJA's proposed amicus brief (accompanied by its motion for leave) would be due April 2, 2021. No request for additional time has been denied or denied in part.

Good cause exists to allow NJA to extend the filing deadline for both its motion for leave and proposed amicus brief until 30 days after this Court's Order for the following reasons:

1. NJA's participation in this matter had to be approved by a Committee before counsel could make an appearance.

2. NJA first appeared in this matter on March 31, 2021, and counsel need time to familiarize themselves with the record, the legal arguments, and the briefing currently before the Court.

3. NJA believes it can assist this Court in issues relating to whether heirs in wrongful death, medical malpractice nursing home cases are bound by the signature of the decedent to arbitrate and the interpretation of NRS 597.995.

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This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(1)(a). For the foregoing reasons, NJA respectfully moves this Court for an extension of time to file its proposed amicus brief (accompanied by its motion for leave) no later than 30 days after this Court's Order.

Dated this 31st day of March 2021.

CLAGGETT & SYKES LAW FIRM

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR LEAVE TO FILE AMICUS BRIEF OF THE NEVADA JUSTICE ASSOCIATION (First Request)** was filed electronically with the Nevada Supreme Court on the 31st day of March 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

John M. Orr (Lewis Brisbois Bisgaard & Smith, LLP/Las Vegas)

S. Brent Vogel (Lewis Brisbois Bisgaard & Smith, LLP/Las Vegas)

Jamie S. Cogburn (Cogburn Law Offices)

Hunter S. Davidson (Cogburn Law Offices)

/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm