

1 **COHEN JOHNSON, LLC**  
2 **H. STAN JOHNSON, ESQ.**  
3 Nevada Bar No. 00265  
4 **sjohnson@cohenjohnson.com**  
5 **RYAN D. JOHNSON, ESQ.**  
6 Nevada Bar No. 14724  
7 **rjohnson@cohenjohnson.com**  
8 375 E. Warm Springs Road, Suite 104  
9 Las Vegas, Nevada 89119  
10 Telephone: (702) 823-3500  
11 Facsimile: (702) 823-3400  
12 *Attorneys for Respondent David John Rose*

Electronically Filed  
Jul 02 2021 01:22 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

11 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

12 SARAH JANEEN ROSE, an individual,

Supreme Court No. 81859

13 Appellant,

District Court No. A-20-815750-C

14 vs.

15 DAVID JOHN ROSE, an individual,

16 Respondent.  
17  
18

19 **STIPULATION TO EXTEND TIME TO FILE**  
20 **RESPONDENT'S ANSWERING BRIEF**

21 ///

22 ///

23 ///

24 ///

25 Pursuant to NRAP 26(b)(2), the Parties stipulate and agree that Respondent  
26 David John Rose ("Respondent") shall have an extension of thirty (30) days, up to  
27  
28

1 and including Friday, August 6, 2021, in which to file his Answering Brief on  
2 appeal. This is the first extension requested with respect to the Answering Brief.  
3

4 DATED this 2<sup>nd</sup> day of July, 2021.

5 **COHEN JOHNSON, LLC**

6 By: /s/ H. Stan Johnson

7 H. STAN JOHNSON

8 RYAN D. JOHNSON

9 Attorneys for Respondent David John Rose

10  
11 DATED this 2<sup>nd</sup> day of July 2021.

12 **BAILEY KENNEDY**

13 By: /s/ Paul C. Williams

14 DENNIS L. KENNEDY

15 PAUL C. WILLIAMS

16 Attorneys for Appellant Sarah Janeen Rose  
17 in Conjunction with the Legal Aid Center of  
18 Southern Nevada Pro Bono Project  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Re: Rose v. Rose Appeal Answering Brief Deadline Extension**

Ryan Johnson <rjohnson@cohenjohnson.com>

Fri 7/2/2021 12:36 PM

**To:** Paul Williams <PWilliams@baileykennedy.com>

**Cc:** H. Stan Johnson <sjohnson@cohenjohnson.com>; Sharon Murnane <SMurnane@baileykennedy.com>; Dennis Kennedy <DKennedy@baileykennedy.com>

Oh, you're right. I missed that. I'll make the change. Thanks.

Ryan Johnson

Attorney

COHEN|JOHNSON, LLC

375 E. Warm Springs Road, Suite 104

Las Vegas, Nevada 89119

Tel. 702-823-3500

Fax 702-823-3400

rjohnson@cohenjohnson.com

As applicable, this communication is CONFIDENTIAL and protected by the Attorney-Client and/or the Attorney Work Product Privileges. It is intended solely for the addressees listed above. Anyone not listed above, or who is not an agent authorized to receive it for delivery to an addressee, is not authorized to read, disseminate, forward, copy, distribute, or discuss its contents, or any part thereof. Anyone else must immediately delete the message, and reply to the sender only, confirming you have done so.

---

**From:** Paul Williams <PWilliams@baileykennedy.com>

**Sent:** Friday, July 2, 2021 12:35 PM

**To:** Ryan Johnson <rjohnson@cohenjohnson.com>

**Cc:** H. Stan Johnson <sjohnson@cohenjohnson.com>; Sharon Murnane <SMurnane@baileykennedy.com>; Dennis Kennedy <DKennedy@baileykennedy.com>

**Subject:** Re: Rose v. Rose Appeal Answering Brief Deadline Extension

Hi Ryan,

You may affix my signature and file it. Note that August 6th is a Friday—if you make that change, you may affix my signature and file a version with that change.

Thank you,

Paul C. Williams

Bailey Kennedy, LLP

8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

[\(702\) 562-8820](tel:7025628820) (Main)

[\(702\) 789-4552](tel:7027894552) (Direct)

[\(702\) 301-2725](tel:7023012725) (Cell)

[\(702\) 562-8821](tel:7025628821) (Fax)

[PWilliams@BaileyKennedy.com](mailto:PWilliams@BaileyKennedy.com)

\*\*\*\*\*This email is a confidential communication from Bailey Kennedy, LLP and is intended only for the named recipient(s) above and may contain information that is a trade secret, proprietary, privileged or attorney work product. If you have received this message in error, or are not the named or intended recipient(s), please immediately notify the sender at [\(702\) 562-8820](tel:7025628820) and delete this email and any attachments from your workstation or network mail system.\*\*\*\*\*

On Jul 2, 2021, at 3:02 PM, Ryan Johnson <[rjohnson@cohenjohnson.com](mailto:rjohnson@cohenjohnson.com)> wrote:

Paul,

Thanks again for allowing us to extend our answering brief deadline. I've attached a proposed stipulation which I based on the one you prepared earlier in this matter. Please let us know if you approve the content and form and that we can submit it with your e-signature.

Thanks,

Ryan Johnson

Attorney  
COHEN|JOHNSON, LLC  
375 E. Warm Springs Road, Suite 104  
Las Vegas, Nevada 89119  
Tel. 702-823-3500  
Fax 702-823-3400  
[rjohnson@cohenjohnson.com](mailto:rjohnson@cohenjohnson.com)

As applicable, this communication is CONFIDENTIAL and protected by the Attorney-Client and/or the Attorney Work Product Privileges. It is intended solely for the addressees listed above. Anyone not listed above, or who is not an agent authorized to receive it for delivery to an addressee, is not authorized to read, disseminate, forward, copy, distribute, or discuss its contents, or any part thereof. Anyone else must immediately delete the message, and reply to the sender only, confirming you have done so.

---

**From:** Paul Williams <[PWilliams@baileykennedy.com](mailto:PWilliams@baileykennedy.com)>  
**Sent:** Wednesday, June 30, 2021 2:35 PM  
**To:** Ryan Johnson <[rjohnson@cohenjohnson.com](mailto:rjohnson@cohenjohnson.com)>  
**Cc:** H. Stan Johnson <[sjohnson@cohenjohnson.com](mailto:sjohnson@cohenjohnson.com)>; Sharon Murnane <[SMurnane@baileykennedy.com](mailto:SMurnane@baileykennedy.com)>; Dennis Kennedy <[DKennedy@baileykennedy.com](mailto:DKennedy@baileykennedy.com)>  
**Subject:** RE: Rose v. Rose Appeal Answering Brief Deadline Extension

Hi Ryan,

Of course—not a problem. However, note that under NRAP 31(b)(2), we can only stipulate to extend the deadline for a max of 30 days:

**(2) Stipulations.** Unless the court orders otherwise, in all appeals except child custody, visitation, or capital cases, the parties may extend the time for filing any brief for a total of 30 days beyond the due dates set forth in Rule 31(a)(1) by filing a written stipulation with the clerk of the Supreme Court on or before the brief's due date. No extensions of time by stipulation are permitted in child custody, visitation, or capital cases.

30 days only gets you until August 6<sup>th</sup>, which is a Friday unfortunately (if it landed on a Saturday, it would automatically extend to the next Monday).

Thus, if you want to ask for an extension to beyond August 6<sup>th</sup>, the rules require a motion under NRAP 31(b)(3). *See* NRAP 31(b)(3)(B) ("Applications for extensions of time beyond that to which the parties are permitted to stipulate under Rule 31(b)(2) are not favored. The court will grant an initial motion for extension of time for filing a brief only upon a clear showing of good cause. The court shall not grant additional extensions of time except upon a showing of extraordinary circumstances and extreme need."). If you would prefer to go the Motion route, we will not oppose it and you can note it is unopposed in the motion.

Let me know your preference.

Thank you,

Paul C. Williams  
Bailey Kennedy, LLP  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
(702) 562-8820 (Main)  
(702) 789-4552 (Direct)  
(702) 301-2725 (Cell)  
(702) 562-8821 (Fax)  
[PWilliams@BaileyKennedy.com](mailto:PWilliams@BaileyKennedy.com)

\*\*\*\*\*This email is a confidential communication from Bailey Kennedy, LLP and is intended only for the named recipient(s) above and may contain information that is a trade secret, proprietary, privileged or attorney work product. If you have received this message in error, or are not the named or intended recipient(s), please immediately notify the sender at (702) 562-8820 and delete this email and any attachments from your workstation or network mail system.\*\*\*\*\*

---

**From:** Ryan Johnson <rjohnson@cohenjohnson.com>  
**Sent:** Wednesday, June 30, 2021 2:17 PM  
**To:** Paul Williams <PWilliams@baileykennedy.com>; Dennis Kennedy <DKennedy@baileykennedy.com>  
**Cc:** H. Stan Johnson <sjohnson@cohenjohnson.com>  
**Subject:** Rose v. Rose Appeal Answering Brief Deadline Extension

Good Afternoon Paul,

As I'm sure you're aware, our Answering Brief in the Rose appeal is currently due on July 7th. We've been really slammed, and are currently hurrying to finish an Opening brief that is due in another appeal that is actually due on the 8th. Great timing on our part, we know. We were hoping that you extend us the professional courtesy and agree to stipulate to allow us to extend our answering brief deadline until August 9th, or just over 30 days. I'm

leaving town this Friday, and hope to be able to submit the stipulation if you agree before then.

Thanks for your understanding.

Ryan Johnson

Attorney  
COHEN|JOHNSON, LLC  
375 E. Warm Springs Road, Suite 104  
Las Vegas, Nevada 89119  
Tel. 702-823-3500  
Fax 702-823-3400  
[rjohnson@cohenjohnson.com](mailto:rjohnson@cohenjohnson.com)

As applicable, this communication is CONFIDENTIAL and protected by the Attorney-Client and/or the Attorney Work Product Privileges. It is intended solely for the addressees listed above. Anyone not listed above, or who is not an agent authorized to receive it for delivery to an addressee, is not authorized to read, disseminate, forward, copy, distribute, or discuss its contents, or any part thereof. Anyone else must immediately delete the message, and reply to the sender only, confirming you have done so.

<210702 Stip to Extend Answering Brief Deadline.pdf>