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Electronically Filed
Aug 06 2021 02:21 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

SARAH JANEEN ROSE, an
individual,

Appellant,

vs.

DAVID JOHN ROSE, an individual,

Respondent.

Supreme Court No. 81859

District Court No. A-20-815750-C

MOTION FOR EXTENSION OF TIME TO FILE
ANSWERING BRIEF
(SECOND REQUEST)

Respondent hereby moves for 30-day extension of time to file their
Answering Brief, which is currently due August 6, 2021. If granted, the

1 brief will be due on September 6, 2021¹. NRAP 31(b)(3). This brief was
2 originally due July 7, 2021 but was extended by thirty days by stipulation
3 of the parties which was granted by this Court. This is therefore the
4 second request for an extension of the briefing due date but the first such
5 motion. No request for an extension of time has been denied or denied in
6 part.
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9 Respondent's attorneys have been diligently working on the
10 Answering Brief, but a further thirty (30) day extension of the briefing
11 schedule is necessary for several reasons.
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13 Respondent's Counsel's office has had several recent cases on
14 appeal with this Court and some deadlines have unfortunately
15 overlapped. Most significantly, Respondent's counsel just recently
16 completed and submitted an Opening brief in the past week which
17 required more time and resources than expected. The above referenced
18 appeal took more time and resources than expected and therefore it is
19 necessary to request the additional time.
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23 Extending Respondent's Answering Brief deadline by thirty days
24 from August 6, 2021, to Monday, September 6, 2021, should ensure that
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¹ A thirty-day extension would set the deadline for Sunday, September 5, 2021. The next available court day is Monday, September 6, 2021.

Respondent' Counsel will have the requisite time and resources to complete the Answering Brief.

One of the firm's lawyers that works on all of the firm's appeals has recently taken a several week leave of absence due to a death in the family.

The undersigned counsel is also dealing with non-Covid-19 medical issues and that have taken him out of the office numerous times for medical appointments and testing that have impacted his ability to work as many hours as needed. Counsel is in the process of obtaining medical clearances for scheduled surgery.

Under these circumstances, Respondent's attorneys were unable to finish the brief by August 6, 2021. The circumstances set forth in this motion were unforeseeable and good cause exists for a 30-day extension. NRCP 26 (1)(A). Respondent's attorneys firmly believe they will be able to file the opening brief within the extended time. Appellants will not be prejudiced as evidenced by their willingness to previously agree to a thirty-day stipulated extension.

Therefore, Respondent requests an extension until September 6, 2021. This motion is made in good faith and without the intent to delay the appeal unnecessarily.

1 Dated this 6th day of August 2021.

2 COHEN JOHNSON LLC

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4 By: /s/ H. Stan Johnson
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9 *Attorneys for Respondent*
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