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

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

11 SARAH JANEEN ROSE, an  
12 individual,

13 Appellant,

14 vs.

15 DAVID JOHN ROSE, an individual,

16 Respondent.

Supreme Court No. 81859

District Court No. A-20-815750-C

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21 **MOTION FOR EXTENSION OF TIME TO FILE**  
22 **ANSWERING BRIEF**  
23 **(SECOND REQUEST)**

24 Respondent hereby moves for 30-day extension of time to file their  
25 Answering Brief, which is currently due August 6, 2021. If granted, the  
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1 brief will be due on September 6, 2021<sup>1</sup>. 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.  
12

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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<sup>1</sup> A thirty-day extension would set the deadline for Sunday, September 5, 2021. The next available court day is  
Monday, September 6, 2021.

1 Respondent' Counsel will have the requisite time and resources to  
2 complete the Answering Brief.  
3

4 One of the firm's lawyers that works on all of the firm's appeals has  
5 recently taken a several week leave of absence due to a death in the  
6 family.  
7

8 The undersigned counsel is also dealing with non-Covid-19 medical  
9 issues and that have taken him out of the office numerous times for  
10 medical appointments and testing that have impacted his ability to work  
11 as many hours as needed. Counsel is in the process of obtaining medical  
12 clearances for scheduled surgery.  
13

14 Under these circumstances, Respondent's attorneys were unable to  
15 finish the brief by August 6, 2021. The circumstances set forth in this  
16 motion were unforeseeable and good cause exists for a 30-day extension.  
17 NRCP 26 (1)(A). Respondent's attorneys firmly believe they will be able  
18 to file the opening brief within the extended time. Appellants will not be  
19 prejudiced as evidenced by their willingness to previously agree to a  
20 thirty-day stipulated extension.  
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25 Therefore, Respondent requests an extension until September 6,  
26 2021. This motion is made in good faith and without the intent to delay  
27 the appeal unnecessarily.  
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Dated this 6th day of August 2021.

COHEN JOHNSON LLC

By: /s/ H. Stan Johnson  
H. Stan Johnson, Esq.  
Nevada Bar No. 0265  
375 E. Warm Spring Rd, Ste. 104  
Las Vegas, Nevada 89119  
*Attorneys for Respondent*

1 **CERTIFICATE OF SERVICE**

2 I certify that on 6th day of August 2021, pursuant to N.E.F.R. 7, I  
3  
4 caused the MOTION FOR EXTENSION OF TIME TO FILE  
5 ANSWERING BRIEF (Second Request) to be filed electronically with the  
6 Clerk of the Nevada Supreme Court. Pursuant to N.E.F.R. 9, notice of an  
7 electronically filed document by the Court “shall be considered as valid  
8 and effective service of the document” on all persons who are registered  
9 users.  
10  
11

12 DATED the 6th day of August, 2021.

13 */s/ Sarah Gondek*  
14

15 An employee of COHEN JOHNSON, LLC  
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