

IN THE SUPREME COURT OF THE STATE OF NEVADA

FEDERAL NATIONAL
MORTGAGE ASSOCIATION,

Appellant,

vs.

WESTLAND LIBERTY VILLAGE,
LLC, a Nevada limited liability
company; and WESTLAND
VILLAGE SQUARE, LLC, a Nevada
limited liability company,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No. 82174

District Court Case No. A-20-819412-B

APPEAL

**From the Eighth Judicial District Court
The Honorable Kerry Earley/ The Honorable Mark Denton¹**

**MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF
(FIRST REQUEST BY MOTION)**

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Attorneys for Appellant Federal National Mortgage Association

¹ This challenged order in this matter was issued by Judge Kerry Earley after the case had been transferred to Judge Mark Denton.

Appellant, by and through its counsel of record, the law firm of Snell & Wilmer L.L.P., hereby moves for a two-week extension of time to file its Opening Brief in support of its motion for reconsideration. The Brief is currently due for filing on June 8, 2021, following a fourteen-day extension pursuant to NRAP 26(b)(1)(B). Appellant respectfully requests an additional extension until June 22, 2021 pursuant to NRAP 27 and NRAP 31. An additional extension is needed to fully brief this matter and for adequate time for client review. Notably, the entire length of extension sought for the Brief still totals only 28 days, which is less than the length of extension permitted by stipulation of the parties (along with the approval of the Court).

The primary reason for undersigned counsel's need for the requested additional time is that her minor child suffered an injury at a sporting event on Thursday, May 27, which affected her ability to work on Friday, May 28. The injury was diagnosed as a fractured patella (broken kneecap) following the holiday weekend on Tuesday, June 1, and has required time-consuming diagnostic and medical appointments, as well as supporting his limited mobility. In light of this injury and the time it has demanded from undersigned counsel, Appellant respectfully requests an additional 14 days to allow sufficient time to complete the Brief and allow for client review.

Counsel represents that they intend to seek no additional extensions and intends to file on June 22, 2021.

DATED: June 4, 2021

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove

Kelly H. Dove (Nevada Bar No. 10569)

Nathan G. Kanute, Esq. (Nevada Bar No. 12413)

Bob L. Olson, Esq. (Nevada Bar No. 3783)

*Attorneys for Appellant Federal National
Mortgage Association*

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On June 4, 2021, I caused to be served a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF** upon the following by the method indicated:

- ☐ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the e-mail addresses set forth below and/or included on the Court's Service List for the above-referenced case.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below:

/s/ Kelly H. Dove

An Employee of SNELL & WILMER L.L.P.