

IN THE SUPREME COURT OF THE STATE OF NEVADA

VALLEY HEALTH SYSTEM, LLC, D/B/A  
CENTENNIAL HILLS HOSPITAL MEDICAL  
CENTER, A FOREIGN LIMITED LIABILITY  
COMPANY; DR. DIONICE S. JULIANO, M.D., AN  
INDIVIDUAL; DR. CONRADO C.D. CONCIO,  
M.D., AN INDIVIDUAL; AND DR. VISHAL S.  
SHAH, M.D., AN INDIVIDUAL,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF  
THE STATE OF NEVADA, IN AND FOR THE  
COUNTY OF CLARK; AND THE HONORABLE  
JERRY W. WIESE, DISTRICT JUDGE,

Respondents,

and

ESTATE OF REBECCA POWELL THROUGH  
BRIAN POWELL, AS SPECIAL ADMINISTRATOR;  
DARCI CREECY, INDIVIDUALLY AND AS HEIR;  
TARYN CREECY, INDIVIDUALLY AND AS HEIR;  
ISAIAH KHOSROF, INDIVIDUALLY AND AS  
HEIR; LLOYD CREECY, INDIVIDUALLY,

Real Parties in Interest.

Electronically Filed  
Dec 13 2021 01:31 p.m.  
Supreme Court Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO EXTEND BRIEFING DEADLINE**

Pursuant to Nevada Rules of Appellate Procedure (“NRAP”) 26(b)(1), 27 and 31, Real Parties in Interest (Darci Creecy, Taryn Creecy and Isaiah Khosrof – “the Creecy Children”) respectfully request the Court extend, by four additional days or until December 17, 2021, their time to file a Petition for *En Banc* Reconsideration. Currently, the Petition is due today, December 13, 2021. This request for a short 4-day extension of time is warranted and supported by extraordinary and compelling circumstances. As detailed below, this is the Creecy Children’s second request for an extension of time to file a Petition for *En Banc* Reconsideration.

1 By Order issued November 23, 2021, the Court extended the Creecy Children's time to  
2 seek *En Banc* Reconsideration to and until December 13, 2021 based upon a telephonic request  
3 made by undersigned counsel. Since that time, undersigned counsel for the Creecy Children  
4 has been working diligently to finalize the Petition for filing with the Court within the current  
5 deadline. However, during the past week, undersigned counsel experienced flu like symptoms  
6 that he feared might be COVID related. Thankfully, undersigned counsel did not contract  
7 COVID and, instead, appeared only to be affected by a cold/flu. However, given the  
8 extraordinary and compelling nature of COVID, undersigned counsel was required to follow  
9 precautionary and safety measures until it could be determined whether he had in fact been  
10 infected by the virus.

11 As a result of the foregoing, undersigned counsel was not able to dedicate the time  
12 necessary to completing the Petition within the current deadline. While undersigned counsel  
13 does not have COVID, he remains affected by his recent illness. Based upon the foregoing, the  
14 Creecy Children, by and through undersigned counsel, respectfully request the briefing schedule  
15 for seeking *En Banc* Reconsideration in this matter be extended by 4-days or until December  
16 17, 2021. This short extension should permit undersigned counsel sufficient time to recuperate,  
17 complete the Petition and file it with the Court. There will be no prejudice to any other parties  
18 should the Court grant this request for a 4-day extension since under NRAP 40A(e), no Answer  
19 to a Petition seeking *En Banc* reconsideration is permitted except by request of the Court.

20  
21 Respectfully submitted,

22 /s/ Paul S. Padda

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24 Paul S. Padda, Esq.  
25 PAUL PADDA LAW  
26 4560 South Decatur Blvd., Suite 300  
27 Las Vegas, Nevada 89103  
28 Tele: (702) 366-1888  
*Counsel for Real Parties In Interest*

Dated: December 13, 2021

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CERTIFICATE OF SERVICE

Pursuant to the Rules of the Nevada Supreme Court, the undersigned hereby certifies that on this day, December 13, 2021, a copy of the foregoing **MOTION TO EXTEND BRIEFING DEADLINE** was filed with the Court and served via electronic service notification where specified on the Court’s service list to the individuals and entities identified therein.

/s/ *Karen Cormier*

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Karen Cormier, Paralegal  
PAUL PADDALAW