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Elizabeth A. Brown  
Clerk of Supreme Court

6 **SUPREME COURT OF NEVADA**

7  
8 STEVE SANSON, an  
Individual; ROB LAUER, an  
9 Individual,,  
10 Appellant,

11 vs.

12 LAWRA KASSEE BULEN  
13 Respondent(s).  
14

SUPREME COURT CASE  
NO.82393  
DISTRICT COURT CASE NO.:  
A-18-784807-C

15 **RESPONDENT'S REQUEST TO EXTEND TIME TO FILE RESPONSE TO**  
16 **APPELLANTS' OPENING BRIEF**

17  
18 Now comes Respondent, Lawra Kasee Bulen, through her counsel of  
19 record, Brandon L. Phillips, Esq., of the firm BRANDON L. PHILLIPS,  
20 ATTORNEY AT LAW, PLLC, and hereby respectfully requests that this  
21 honorable Court extend the time for Respondent to file Response to Appellant's  
22 Opening Brief.  
23  
24

1 Respondent's Response to Appellants' Opening Brief was due on June 28,  
2 2021. Respondent orally requested a continuance through the Clerk's Office,  
3 which was granted moving the date for filing to July 12, 2021. This is  
4 Respondent's first Motion to Extend Time. Appellants are, in short, requesting a  
5 change to the existing law in the form of further guidance. Additional time is  
6 needed for research on the matter.  
7

8 As identified in Appellants' Opening Brief, Respondent filed an appeal in  
9 the District Court case on the Order Granting Defendants' Motion to Dismiss,  
10 under the Anti-SLAPP statutes. It is unlikely the Court would issue a ruling on  
11 Appellants' current appeal without first ruling on Respondent's appeal, as there  
12 exists the possibility for inconsistent rulings. Therefore, a request for an additional  
13 two week continuance will have no delay or adverse effect on the Appellants. The  
14 request is timely made and is brought in good faith. There is no intent to delay the  
15 filing of the Response.  
16

17 The Parties did participate in discussions with the Settlement Judge and have  
18 exhausted that avenue. Further, the Appellants' counsel did request a continuance  
19 to file the Opening Brief that was unopposed and granted by this Court.  
20

### 21 **PROCEDURAL HISTORY**

- 22 1. This case was decided on Appellants' Motion to Dismiss based on the  
23 defense that the speech at issue was protected by Anti-SLAPP statutes.  
24

- 1 2. It remains Respondent's position that the published language of the  
2 Defendants was not protected by Anti-SLAPP statutes and the Complaint  
3 should not have been summarily dismissed.  
4
- 5 3. The Court Granted Respondents Motion to Set Aside the Default  
6 Judgment on June 23, 2020.
- 7 4. The Court Granted Appellants' Motion to Dismiss on August 21, 2020,  
8 with the Notice of Entry of Order being filed on August 25, 2020.
- 9 5. On December 31, 2020, this Court Granted Respondents' Counsel's  
10 Motion to Withdraw.  
11

### 12 **STATUTORY AUTHORITY**

#### 14 **RULE 31. FILING AND SERVICE OF BRIEFS.**

15 **(a) Time for Serving and Filing Briefs.** Unless a different briefing schedule  
16 is provided by a court order in a particular case or by these or any other court  
17 rules, parties shall observe the briefing schedule set forth in this Rule.  
18

19 **(3) Motions for Extensions of Time.** A motion for extension of time for  
20 filing a brief may be made no later than the due date for the brief and must comply  
21 with the provisions of this Rule and Rule 27.

22 **(A) Contents of Motion.** A motion for extension of time for filing a  
23 brief shall include the following:

- 23 (i) The date when the brief is due;  
24 (ii) The number of extensions of time previously granted (including a 5-  
day telephonic extension), and if extensions were granted, the original date when  
the brief was due;

1 (iii) Whether any previous requests for extensions of time have been  
2 denied or denied in part;

(iv) The reasons or grounds why an extension is necessary; and

3 (v) The length of the extension requested and the date on which the brief  
4 would become due.

5 Respondent's request for an extension of time is the first written motion and  
6 is made timely. This matter requires additional time to analyze, review and draft.

7 The brief request of an additional two weeks will not unnecessarily delay this  
8 matter. Respondent's Response would then be due on July 26, 2021.

9 Appellants' have basically utilized this same avenue for requesting a brief  
10 continuance which was timely filed and granted. There are no anticipated delays  
11 in further compliance.

12 There has been no harm to the Appellants as all other deadlines have been  
13 satisfied. Further, as there was no substantial delay to this case as the related  
14 Appeal is still pending before this Court as recognized by the Appellants.

15 Respectfully, this Motion is brought in good faith. Appellant deserves to  
16 have her Appeal heard on the merits.

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1                   **CONCLUSION**

2                   As stated herein, counsel Phillips respectfully requests that this Court extend  
3 the time to file the Respondent's Response to the Opening Brief to July 26, 2021.  
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5                   \_\_\_\_\_/s/ *Brandon L. Phillips*\_\_\_\_\_  
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**PROOF OF SERVICE**

This is to certify that on the 12th day of July, 2021, I caused to be served  
**RESPONDENT'S MOTION TO EXTEND TIME TO FILE THE  
RESPONSE TO APPELLANTS' OPENING BRIEF**, by the method indicated  
below, and addressed to the following:

**Document Served: Motion**

**Person(s) Served:**

ADAM J. BREEDEN, ESQ.  
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☐ Via Facsimile:  
☐ Mail  
☐ Personal Delivery  
☒ Electronic Notice

/s/ Brandon L. Phillips

An employee of BRANDON L. PHILLIPS,  
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