

**In the Supreme Court of Nevada**

UNITE HERE HEALTH; and NEVADA HEALTH SOLUTIONS, LLC,

Appellants,

vs.

STATE OF NEVADA COMMISSIONER OF INSURANCE, BARBARA D. RICHARDSON, in her official capacity as statutory receiver for delinquent domestic insurer; NEVADA HEALTH CO-OP; and GREENBERG TRAURIG, LLP,

Respondents.

UNITE HERE HEALTH, a multi-employer health and welfare trust, as defined in ERISA section 3(37); and NEVADA HEALTH SOLUTIONS, LLC, a Nevada limited liability company,

Petitioners,

vs.

EIGHTH JUDICIAL DISTRICT COURT of the State of Nevada, in and for the County of Clark, THE HONORABLE TARA D. CLARK NEWBERRY, District Court Judge,

Respondents,

and

STATE OF NEVADA COMMISSIONER OF INSURANCE, BARBARA D. RICHARDSON, in her official capacity as receiver for delinquent domestic insurer; NEVADA HEALTH CO-OP; and GREENBERG TRAURIG, LLP,

Real Parties in Interest.

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Elizabeth A. Brown  
Clerk of Supreme Court

No. 82552

**MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO MOTION TO STAY**

Respondents/real parties in interest request an extension through December 8, 2021, to file their response to appellants/petitioners' motion to stay. NRAP 26(b)(1)(a). This is the first such request. Without an extension, the response would be due November 24, 2021.

Good cause necessitates the extension.

While trial counsel with Greenberg Traurig are taking the lead in the proceedings in the district court, of necessity appellate counsel with Lewis Roca are primarily addressing the questions in this writ petition. Those counsel, however, have been in trial and have had to juggle multiple hearings during breaks, detracting from their ability to address the motions. This past week was particularly difficult with the preparation of jury instructions through evenings and the weekends and a number of other emergencies—all on top of counsel's ordinary workload. Although counsel had expected the trial to conclude earlier, they have had to be involved through today—including to answer the jury's questions and prepare for a possible second phase of trial.

The Court's courtesy under the circumstances is greatly appreciated.

Dated this 24th day of November, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Abraham G. Smith  
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*Attorneys for Real Parties in Interest*

**CERTIFICATE OF SERVICE**

I certify that on November 24, 2021, I submitted the foregoing “Motion for Extension of Time to File Response to Motion for Stay” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

John R. Bailey  
Dennis L. Kennedy  
Sarah E. Harmon  
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8984 Spanish Ridge Avenue  
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*Attorneys for Appellants/Petitioners*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

The Honorable Tara D. Clark Newberry  
DISTRICT COURT JUDGE – DEPT. 16  
200 Lewis Avenue  
Las Vegas, Nevada 89155

*Respondent*

/s/ Jessie M. Helm  
An Employee of Lewis Roca Rothgerber Christie LLP