

IN THE SUPREME COURT OF NEVADA

BANK OF AMERICA, N.A., S/B/M
TO BAC HOME LOANS SERVICING,
LP, F/K/A COUNTRYWIDE HOME
LOANS SERVICING LP,

Appellant,

vs.

VALENCIA MANAGEMENT LLC,
SERIES 9, A NEVADA LIMITED
LIABILITY COMPANY,

Respondent.

Supreme Court No. 82501

District Court Case No. A723600

Electronically Filed
Oct 29 2021 03:38 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE
TRANSCRIPT REQUEST**

Pursuant to NRAP 14(d), Appellant Bank of America, N.A., S/B/M to BAC Home Loans Servicing, LP fka Countrywide Home Loans Servicing, LP (**BANA**) respectfully requests the Court to extend the time to file the Transcript Request.

Dated this 29th day of October, 2021.

AKERMAN LLP

/s/ Lilith V. Xara

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Nevada Bar No. 8276

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Attorneys for Appellant

I. Applicable Legal Standard

Under NRAP 9, the appellant's transcript request was due on October 15, 2021. Failure to properly file the transcript request may result in sanctions. *Id.*

II. Good Cause Exists to Extend Time to File the Transcript Request

Good cause exists to extend time to allow Appellant to file its transcript request. Counsel for appellant takes seriously his obligations to comply with the requirements of NRAP 9. Two factors contributed to the untimely filing of the transcript request. The first was a calendaring error which was not ascertained until today. Secondly, counsel is attempting to settle this case, which likely caused the calendar error to not be caught sooner. This error was discovered Friday, October 29, 2021. The transcript request is being completed and filed on the same date—the same business day as discovering the problem.

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Appellant makes this request in good faith and not for the purpose of harassment or delay. Appellant respectfully requests the court excuse the failure to file the transcript request prior to the deadline due to good cause being shown.

Dated this 29th day of October, 2021.

AKERMAN LLP

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to BAC Home Loans Servicing, LP fka
Countrywide Home Loans Servicing, LP*

CERTIFICATE OF SERVICE

I certify that I electronically filed on October 29, 2021, the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE TRANSCRIPT REQUEST** with the Clerk of the Court for the Nevada Supreme Court by using the Court's electronic file and serve system. I further certify that all parties of record to this appeal are either registered with the Court's electronic filing system or have consented to electronic service and that electronic service shall be made upon and in accordance with the Court's Master Service List.

I declare that I am employed in the office of a member of the bar of this Court at whose discretion the service was made.

/s/ Patricia Larsen

An employee of AKERMAN LLP