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Elizabeth A. Brown  
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**IN THE SUPREME COURT OF THE STATE OF NEVADA**

Erich M. Martin,

Appellant,

vs.

Raina L. Martin,

Respondent.

Case Nos.: 81810/82517

Appeal from the Eighth Judicial District  
Court, The Honorable Rebecca L.  
Burton Presiding

**MOTION FOR EXTENSION OF TIME TO  
FILE ANSWER TO PETITION FOR REVIEW**

**(First Written Request)**

Appellant, Erich M. Martin (“Erich”), by and through his counsel of record, Marquis Aurbach, hereby moves this Court pursuant to NRAP 31(b) for a 14-day extension of time to file his answer to the petition for review (“Answer”).

Erich's Answer was originally due on December 30, 2021. This Court granted a telephonic extension on December 29, 2021, making Erich's Answer currently due on January 13, 2022. If this Court grants the instant request for a 14-day extension, Erich's Answer will be due on January 27, 2022. The following good cause exists for extending the filing deadline until January 27, 2022:

1. Chad F. Clement, Esq., counsel for Erich, was out of the office for several weeks after contracting COVID-19. Upon his return, Mr. Clement had a significant backlog that needed prompt attention.

2. Relatedly, counsels' office has been chronically short-staffed since the middle of December. Although holiday outages were planned, the office was also hit hard by a surge in COVID-19 cases. Consistent with guidance from the CDC and government authorities, employees who felt ill and those who tested positive were subject to quarantine and other cautionary measures.

3. Because of Mr. Clement's illness, the holidays, and the surge in COVID-19 cases, counsel did not receive client and firm approval to continue work in this matter until January 11, 2022.

4. Although counsel have made good progress in preparing a draft answer, other pending deadlines and previously-scheduled hearings prevented counsel from completing a polished draft fitting for the Court's review.

Therefore, Erich requests that this Court grant the instant motion and allow an additional 14 days, until January 27, 2022, to file the Answer. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 13th day of January, 2022.

MARQUIS AURBACH

By /s/ Kathleen A. Wilde

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO PETITION FOR REVIEW** was filed electronically with the Nevada Supreme Court on the 13th day of January, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Marshall S. Willick, Esq.

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

Richard Crane, Esq.  
3591 East Bonanza Road, Suite 200  
Las Vegas, Nevada 89110-2101

/s/ Leah Dell  
An employee of Marquis Aurbach