

IN THE SUPREME COURT OF THE STATE OF NEVADA

OCWEN LOAN SERVICING, LLC, A
FOREIGN LIMITED LIABILITY
COMPANY,

Appellant,

v.

CHERSUS HOLDINGS, LLC, A
DOMESTIC LIMITED LIABILITY
COMPANY; AND
SOUTHERN TERRACE HOMEOWNERS
ASSOCIATION, A DOMESTIC NON-
PROFIT CORPORATION,

Respondents.

No. 82680

Electronically Filed
Apr 14 2022 07:40 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME
TO FILE ANSWERING BRIEF**

MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF

Respondent CHERSUS HOLDINGS, LLC (“Respondent”) hereby requests an extension of time to file its Answering Brief. The Opening Brief in this matter was originally due on February 14, 2022. Respondent requested and received an Order Granting Telephonic Extension until March 9, 2022 to file and serve its answering brief. The Court granted Respondents Motion for a further extension which extended the deadline to file the Answering Brief until April 11, 2022.

As mentioned in the prior Motion for an Extension of Time, due to COVID-19, Respondent’s counsel had to layoff many of employees. Counsel currently has a Legal Assistant/Office Manager. Sadly, the Legal Assistant/Office Manager recently suffered a severe knee. Since, the last motion she has continued to suffer from knee pain and other ailments and she has not been able return to work full-time.

1 When we received the Order granting the extension until April 11, 2022, I
2 asked our Legal Assistant to calendar the date in our system. I also saved a copy to my
3 calendar. Unfortunately, our Legal Assistant did not see the email I sent to her asking
4 her to calendar the date in our system. Also, when I saved a copy to my calendar I
5 accidentally saved a copy to my April 14th calendar.
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8 I looked at my calendar on Monday when I was working on the Answering
9 Brief and discovered I had mistakenly calendared the deadline for April 14, 2022. I
10 immediately resumed working on the Answering Brief. I have been working on it non-
11 stop since Monday and just finished it. I will be e-filing it soon this morning.
12

13 Accordingly, Respondent respectfully requests the Court extend the time to
14 file the Answering Brief until April 15, 2022.
15

16 DATED: April 14, 2022

17 THE LAW OFFICE OF VERNON NELSON,
18 PLLC
19 By: /s/ Vernon Nelson
20 VERNON NELSON
21 Nevada Bar No. 6434
22 9550 S. Eastern Ave., Suite 253
23 Las Vegas, NV 89123
24 Attorneys for Respondent
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of The Law Office of Vernon Nelson, and that on the 11th day of April, 2022, I caused to be served a true and correct copy of the foregoing RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF, in the following manner:

Electronic Service of the document shall be made in electronically to all parties/counsel identified on the Master Service List.

/s/ Vernon Nelson
An Employee of The Law Office of Vernon Nelson

1 DECLARATION OF VERNON NELSON, ESQ.

2 I, Vernon Nelson, declare as follows:

3 1. I am an attorney licensed to practice law in the State of Nevada, and the
4 Managing Member of the Law Office of Vernon Nelson (“LOVN”), counsel for
5 Respondents, on whose behalf I make this declaration. I am responsible for handling
6 this matter. If called as a witness I would competently testify to the matters set forth
7 herein of my own personal knowledge.
8

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10 2. The Opening Brief in this matter was originally due on February 14, 2022. I
11 requested and received an Order Granting Telephonic Extension until March 9,
12 2022 to file and serve the answering brief. As mentioned in the prior Motion for
13 an Extension of Time, due to COVID-19, Respondent’s counsel had to layoff many
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6 Accordingly, I respectfully request the Court extend the time to file the
7 Answering Brief until April 15, 2022.
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9 I swear under the penalty of perjury that the foregoing is true and correct.

10 April 14, 2022

/s/Vernon Nelson

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12 _____
Vernon Nelson
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