

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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

Appellant,

vs.

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

Respondents.

**Supreme Court Case No. 82680**

District Court Case No. 2022-18587  
Electronically Filed  
Jun 10 2022 04:32 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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**MOTION TO EXTEND TIME TO FILE APPELLANT'S REPLY BRIEF**

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*Attorneys for Appellant, Ocwen Loan Servicing, LLC.*

Appellant, Ocwen Loan Servicing, LLC (“Ocwen”), by and through its attorney of record, Christina V. Miller, Esq. of the law firm of Wright, Finlay & Zak, LLP, hereby requests an extension of time of fourteen (14) days within which to file its Reply Brief, from June 14, 2022 to June 28, 2022. Mark Lounsbury, Esq., an attorney with the law firm of Wright, Finlay & Zak, LLP, and assisting Ms. Miller with this appeal, attempted to contact counsel for Respondent, Chersus Holdings, LLC (“Chersus”), on June 8, 2022 and June 10, 2022, to obtain consent for the requested extension of time, but has not received any response as of the time of filing the instant Motion.<sup>1</sup>

On May 26, 2022, the Court filed an Order Granting Telephonic Extension pursuant to NRAP 26(b)(1)(B), which extended the deadline to file the Reply Brief to June 14, 2022. Ocwen has not made any requests for extensions of time other than the telephonic extension and no request for extension has been denied in whole or in part.

Good cause exists to extend the deadline because of the confluence of preparing multiple appellate briefs, as well as jury trial preparation for multiple

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<sup>1</sup> The undersigned counsel does not anticipate any objection from Chersus to this request for a brief 14-day extension in light of the fact that Chersus itself requested multiple extensions of time to file its Answering Brief and then, even after filing its Answering Brief on April 14, 2022, filed an Amended Answering Brief on April 19, 2022 (without prior leave of this Court to do so, although this Court approved the Amended Answering Brief on April 29, 2022, striking the first-filed Answering Brief), requiring Ocwen to restart its review and analysis of the Amended Answering Brief and causing delay in preparing Ocwen’s Reply Brief.

other matters pending in the Eighth Judicial District Court. Moreover, there is a large record on appeal raising numerous appellate issues which supports Ocwen's request for reversal and remand, as reflected by the 18 volumes of the Appendix. Further, Chersus's Amended Answering Brief raised a voluminous number of arguments that each need to be analyzed and addressed in Ocwen's Reply Brief, which has taken longer than anticipated to complete. The undersigned counsel is diligently attempting to get the Reply Brief drafted, finalized and approved by Ocwen but will be unable to do so prior to the current filing deadline of June 14, 2022. Although Appellant's counsel has endeavored to complete its Reply Brief by June 14, 2022, it will be unable to do so.

Therefore, pursuant to NRAP 31(b), Ocwen respectfully requests a fourteen (14) day extension to file the Reply Brief, which would become due on June 28, 2022. This request is made without prejudice to any party, and is not based on any improper purpose or delay.

DATED this 10<sup>th</sup> day of June, 2022.

**WRIGHT, FINLAY & ZAK, LLP**

/s/ Christina V. Miller

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*Attorneys for Appellant Ocwen Loan  
Servicing, LLC.*

**PROOF OF SERVICE**

I HEREBY CERTIFY that I am an employee of Wright, Finlay & Zak, LLP., and that on the 10<sup>th</sup> day of June, 2022, I caused to be served a true and correct copy of the foregoing **MOTION TO EXTEND TIME TO FILE APPELLANT’S REPLY BRIEF**, electronically to the parties registered on the Court’s E-Flex System.

/s/ Tonya Sessions  
An Employee of WRIGHT, FINLAY & ZAK, LLP