

IN THE SUPREME COURT OF THE STATE OF NEVADA

STATE OF NEVADA, EX REL.
COMMISSIONER OF INSURANCE,
BARBARA D. RICHARDSON, IN HE
OFFICIAL CAPACITY AS
RECEIVER FOR SPIRIT
COMMERCIAL AUTO RISK
RETENTION GROUP, INC

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK, AND THE
HONORABLE, MARK R. DENTON,
DISTRICT JUDGE, DEPT. 13

Respondents,

And Concerning,

THOMAS MULLIGAN, an individual;
CTC TRANSPORTATION
INSURANCE SERVICES OF
MISSOURI, LLC, a Missouri Limited
Liability Company; CTC
TRANSPORTATION INSURANCE
SERVICES LLC, a California Limited
Liability Company; CTC
TRANSPORTATION INSURANCE
SERVICES OF HAWAII LLC, a
Hawaii Limited Liability Company;
CRITERION CLAIMS SOLUTIONS
OF OMAHA, INC., a Nebraska
Corporation; PAVEL KAPELNIKOV,
an individual; CHELSEA FINANCIAL
GROUP, INC., a California
Corporation; CHELSEA FINANCIAL
GROUP, INC., a Missouri
Corporation; CHELSEA FINANCIAL
GROUP, INC., a New Jersey
Corporation d/b/a CHELSEA
PREMIUM FINANCE
CORPORATION; FOURGOREAN
CAPITAL, LLC, a New Jersey Limited
Liability Company; KAPA

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Aug 25 2021 11:32 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No.: 82701

District Court Case No.: A-20-809963-B

**REAL PARTIES IN INTEREST THE
SIX ELEVEN PARTIES'
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
ANSWERING BRIEF**

MANAGEMENT CONSULTING, INC. a New Jersey Corporation; KAPA VENTURES, INC., a New Jersey Corporation; GLOBAL FORWARDING ENTERPRISES LIMITED LIABILITY COMPANY, a New Jersey Limited Liability Company; NEW TECH CAPITAL, LLC, a Delaware Limited Liability Company; LEXICON INSURANCE MANAGEMENT LLC, a North Carolina Limited Liability Company; ICAP MANAGEMENT SOLUTIONS, LLC, a Vermont Limited Liability Company; SIX ELEVEN LLC, a Missouri Limited Liability Company; 10-4 PREFERRED RISK MANAGERS INC., a Missouri Corporation; IRONJAB LLC, a New Jersey Limited Liability Company; YANINA G. KAPELNIKOV, an individual; IGOR KAPELNIKOV, an individual; QUOTE MY RIG LLC, a New Jersey Limited Liability Company; MATTHEW SIMON, an individual; DANIEL GEORGE, an individual; JOHN MALONEY, an individual; JAMES MARX, an individual; CARLOS TORRES, an individual; VIRGINIA TORRES, an individual; SCOTT McCRAE, an individual; BRENDA GUFFEY, an individual; and 195 GLUTEN FREE LLC, a New Jersey Limited Liability Company,

Real Parties in Interest,

**REAL PARTIES IN INTEREST THE SIX ELEVEN PARTIES'
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
ANSWERING BRIEF**

Real Parties in Interest Six Eleven LLC, Quote My Rig LLC, New Tech Capital LLC, 195 Gluten Free LLC, 10-4 Preferred Risk Managers Inc., Ironjab LLC, Fourgorean Capital LLC, Chelsea Holding Company LLC and Chelsea Financial Group Inc. (“Six-Eleven Parties”) respectfully submit this unopposed

motion for extension of time to file their Answering Brief, which is currently due today, Wednesday, August 25, 2021. The Six-Eleven Parties request a twenty-one (21) day extension, which would make their Answering Brief due on Wednesday, September 15, 2021. Petitioner Barbara D. Richardson as Receiver for Spirit Commercial Auto Risk Retention Group, Inc. does not oppose the 21-day extension. The undersigned submits that extraordinary and compelling circumstances exist for this request. *See* NRAP 26(b)(1)(B).

The undersigned counsel's family – two-year-old son and wife – have been severely ill over the last week, which has required a significant amount of time for counsel to take care of them. The time required to care for family resulted in the undersigned missing significant time from work. On August 23, 2021, the undersigned counsel received Covid-19 diagnoses for his family members, who are high-risk individuals. Significant additional time and effort would have been required as the undersigned's wife and son try to recover from Covid-19, leading to the need for this motion. But in addition, the undersigned began feeling symptoms of Covid-19 on Monday evening, and yesterday morning the undersigned received a positive Covid-19 test result.

The undersigned counsel has had primary responsibility for preparation of the Answering Brief in this matter. His wife and son's illness over the last week, their recent diagnosis with Covid-19, and now his illness and diagnosis with

Covid-19 this morning have led to the need for this motion. Therefore, the Six-Eleven Parties respectfully submit that extraordinary and compelling circumstances exist for an extension.

The Six Eleven Parties received one prior 14-day extension under NRAP 26(b)(1)(B). The original due date for the Answering Brief was August 11, 2021, and the extension made the due date August 25, 2021. No prior extension requests were denied. Based on the extraordinary and compelling circumstances set forth above, the Six-Eleven Parties request that their Motion to Extend be granted and the time to file their Answering Brief be extended for a 21-day period, making it due on Wednesday, September 15, 2021.

DATED this 25th day of August, 2021.

HOWARD & HOWARD ATTORNEYS PLLC

/s/ Kirill V. Mikhaylov

L. CHRISTOPHER ROSE, ESQ. #7500

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Attorneys for Real Parties in Interest Six Eleven

LLC, Quote My Rig LLC, New Tech Capital, LLC,

195 Gluten Free LLC, 10-4 Preferred Risk

Managers, Inc., Ironjab, LLC, Fourgorean Capital

LLC, Chelsea Holding Company, LLC and

Chelsea Financial Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I am employed in the County of Clark, State of Nevada, am over the age of 18 years and not a party to this action. My business address is that of Howard & Howard Attorneys PLLC, 3800 Howard Hughes Parkway, Suite 1000, Las Vegas, Nevada, 89169.

I served the foregoing **REAL PARTIES IN INTEREST THE SIX ELEVEN PARTIES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF** in this action or proceeding electronically with the Clerk of the Court via the E-Flex system, which will cause this document to be served upon the following counsel of record:

<p>Mark E. Ferrario, Esq. Kara B. Hendricks, Esq. Tami D. Cowden, Esq. GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Ste. 600 Las Vegas, Nevada 89135 ferrariom@gtlaw.com hendricksk@gtlaw.com cowdent@gtlaw.com <i>Attorneys for Petitioner State of Nevada, Ex Rel. Commissioner of Insurance; Barbara D. Richardson, in her Official Capacity as Receiver for Spirit Commercial Auto</i></p>	<p>Matthew T. Dushoff, Esq. Jordan D. Wolff, Esq. Satzman Mugan Dushoff 1835 Village Center Circle Las Vegas, Nevada 89134 Mdushoff@nvbusinesslaw.com jwolff@nvbusinesslaw.com <i>Attorneys for Real Parties in Interest CTC Transportation Insurance Services of Missouri, LLC, CTC Transportation Insurance Services, LLC and CTC Transportation Services of Hawaii, LLC</i></p>
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<p>Robert S. Larsen, Esq. Wing Yan Wong, Esq. Gordon Rees Scully Mansukhani, LLP 300 South Fourth Street, Suite 1550 Las Vegas, Nevada 89101 rlarsen@grsm.com wwong@grsm.com Attorneys for Real Parties in Interest Lexicon Insurance Management LLC, Daniel George and ICAP Management Solutions, LLC</p>	<p>Thomas E. McGrath, Esq. Russell D. Christian, Esq. Tyson & Mendes LLP 3960 Howard Hughes Parkway, #600 Las Vegas, Nevada 89169 tmcgrath@tysonmendes.com rchristian@tysonmendes.com Attorneys for Real Parties in Interest Attorneys for Defendants Pavel Kapelnikov, Chelsea Financial Group, Inc., Chelsea Financial Group, Inc., Global Forwarding Enterprises, LLC, Kapa Management Consulting, Inc., Kapa Ventures, Inc., and Igor and Yanina Kapelnikov</p>
<p>William R. Urga, Esq. David J. Malley, Esq. Michael R. Ernst, Esq. Jolley Urga Woodbury & Holthus 330 S. Rampart Blvd., Suite 380 Las Vegas, Nevada 89145 wru@juwlaw.com; djm@juwlaw.com; mre@juwlaw.com Attorneys for Real Parties in Interest Thomas Mulligan</p>	

I certify under penalty of perjury that the foregoing is true and correct, and that this Certificate of Service was executed by me on August 25th, 2021, at Las Vegas, Nevada.

/s/ Stephanie T. George
An employee of HOWARD & HOWARD
ATTORNEYS PLLC