

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

v. Petitioner,

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

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Elizabeth A. Brown
Clerk of Supreme Court

Case No.: 82701

Dist. Ct. Case No.:

A-20-809963-B

**MOTION TO EXTEND TIME
TO FILE ANSWER TO WRIT
PETITION**

Jersey Limited Liability Company; KAPA 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,

GORDON REES SCULLY MANSUKHANI, LLP

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*Attorneys for Lexicon Insurance Management LLC, Daniel George and
ICAP Management Solutions, LLC*

Respondents Lexicon Insurance Management LLC, Daniel George and ICAP Management Solutions, LLC (“George Respondents”) respectfully submit this motion, pursuant to NRAP 26(b)(1), requesting this court grant the George Respondents an extension of time to file their answering brief, which is currently due on August 25, 2021. The George Respondents request a brief extension up to and including September 8, 2021.

Pursuant to NRAP 26(b)(1), BANA submits the following information:

- i. The answer to the petition for writ is currently due on August 25, 2021;
- ii. The answer to petition for writ was originally due on August 11, 2021. The George Respondents previously obtained a telephonic extension to file and serve their answer to the petition for writ;
- iii. This is the George Respondents’ second request to extend time;
- iv. The previous request for extension was not denied;

Although the answer to writ is largely complete, good cause exists to extend the time to file the answering brief due to the numerous issues raised in the 56-page Petition for Writ of Mandamus. Researching, analyzing, and preparing the arguments have taken more time than originally expected. Over the past few weeks, the George Respondents’ counsel also have had a number of unexpected motions, depositions and projects arise in other cases which had their own

deadlines and required a substantial amount of time to complete. Additionally, the George Respondents' lead attorney is travelling out of state for depositions the entirety of the week of August 30, 2021.

vi. The George Respondents' counsel communicated with appellant Petitioner's counsel on August 24, 2021 regarding this motion. Petitioner does not object to the two-week extension. The George Respondents are aware that Petitioner also consented to an extension for several other Respondents to file their respective answer to the petition for writ.

vii. The George Respondents' counsel request a short extension until September 8, 2021 answering brief. This request is made in good faith and not for delay.

DATED this 25th day of August, 2021.

GORDON REES SCULLY
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and ICAP Management Solutions,
LLC*

CERTIFICATE OF SERVICE

Pursuant to NRAP 25, on the 25th day of August, 2021, the foregoing MOTION TO EXTEND TIME TO FILE ANSWER TO WRIT PETITION was served upon those persons designated by the parties in the E-Service Master List, or mailed via U.S. Post Office, first class postage prepaid, upon the following:

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