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3	Nevada Bar No. 12505Electronically Filed <u>jjt@cogburncares.com</u> Electronically Filed2580 St. Rose Parkway, Suite 330Aug 31 2021 03:53	
4	Henderson, Nevada 89074 Telephone: (702) 748-7777 Facsimile: (702) 966-3880 Elizabeth A. Brown Clerk of Supreme	י. ר
5	Attorneys for Appellant	
6	IN THE SUPREME COURT OF THE STATE OF NEVADA	
7	LYNN YAFCHAK, Statutory Heir and Case No.: 82746 Special Administrator to the ESTATE	
8	OF JOAN YAFCHAK, Deceased,	
9	Appellant,	
10	VS.	
11	LIFE CARE CENTERS OF AMERICA, a foreign corporation	
12	d/b/a LIFE CARE CENTER OF SOUTH LAS VEGAS; and DOES 1-	
13	10, inclusive, Respondent.	
14	UNOPPOSED MOTION FOR EXTENSION TO FILE OPENING BRIEF	
15	[Second Request]	
16	Appellant Lynn Yafchak, Statutory Heir and Special Administrator to The	
17	Estate of Joan Yafchak, Deceased, by and through her attorneys, COGBURN LAW,	
18	hereby moves this Court pursuant to NRAP 26(b)(1)(A) and NRAP 31(b)(3) for a	
19	14-day extension of time through September 15, 2021, to file her opening brief.	
20	The opening brief is currently due September 1, 2021. This is the second	
21	request for an extension of time. The first extension granted was for 30 days and	
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Docket 82746 Document 2021-25439

was requested due to multiple conflicting deadlines for various briefs as well as
 preparing for trial in federal court starting on August 9, 2021.

Extraordinary and compelling circumstances exist and form the basis to allow a second extension. Appellant requests a second extension because the two-yearold daughter of the attorneys handling this case was sick with a highly contagious virus for two weeks in August, which caused a significant delay in the preparation of the opening brief. Opposing counsel has represented that they are not opposing this motion.

9 Accordingly, Appellant respectfully requests the Court grant this motion and
10 extend the deadline to file an opening brief by 14 days from September 1, 2021, to
11 September 15, 2021. This motion is submitted in good faith, for good cause, and
12 due to extraordinary and compelling circumstances in accordance with NRAP
13 26(b)(1)(A) and NRAP 31(b)(3).

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Dated this 31st day of August, 2021.

COGBURN LAW

By: <u>/s/Joseph J. Troiano</u> Jamie S. Cogburn, Esq. Nevada Bar No. 8409 Joseph J. Troiano, Esq. Nevada Bar No. 12505 2580 St. Rose Parkway, Suite 330

Henderson, Nevada 89074 Attorneys for Appellant

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1	CERTIFICATE OF SERVICE
2	I hereby certify that the foregoing MOTION FOR EXTENSION TO FILE
3	OPENING BRIEF [Second Request] was filed electronically with the 🖂 Supreme
4	Court of Nevada /
5	Electronic Service of the foregoing document shall be made in accordance with the
6	Master Service List as follows:
7	Casey Tyler Zachary Thompson
8	Zachary Thompson Attorneys for South Las Vegas Medical Investors, LLC d/b/a Life Care Center of South Las Vegas, erroneously nemed as Life Care Centers of America
9	South Las Vegas, erroneously named as Life Care Centers of America
10	/s/Noel Raleigh
11	An employee of Cogburn Law
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