

In the Supreme Court of Nevada

LYNN YAFCHAK, statutory heir and
special administrator to the ESTATE OF
JOAN YAFCHAK, deceased,

Appellants,

vs.

SOUTH LAS VEGAS MEDICAL INVESTORS,
LLC, d/b/a LIFE CARE CENTER OF
SOUTH LAS VEGAS, erroneously named
as LIFE CARE CENTERS OF AMERICA, a
foreign corporation,

Respondent.

Electronically Filed
Nov 15 2021 07:22 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF

Respondent requests an extension of 30 days, through December 15, 2021, to file its answering brief. NRAP 31(b)(3)(C). This is the second such motion. Without an extension, the brief would be due November 15, 2021. The previous request for an extension was granted retroactively.

The primary drafting attorney has just returned from family leave and was unable to assist, including because of having to care for his infant son, who underwent a minor surgical procedure, as well as for his wife and five-year-old daughter, who both became ill. The attorney himself also experienced severe back pain for about two weeks but has improved significantly. While they have been recovering, however, the attorney has been unable to devote significant time to this brief. Other lawyers have

assisted in his absence, but have been stretched thin with the increased workload, a jury trial that is continuing through the week of Thanksgiving, and lead counsel's duties at the Fall Meeting of the American Academy of Appellate Lawyers, where he serves as the Academy's president.

In addition, the extension would allow respondent to address the recently filed 6,247-word amicus brief filed by the Nevada Justice Association.

Respondent appreciates the Court's indulgence.

Dated this 15th day of November, 2021.

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CERTIFICATE OF SERVICE

I certify that on November 15, 2021, I submitted the foregoing “*Motion for Extension of Time to File Answering Brief*” for e-filing and service via the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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Via U.S. Mail:

The Honorable Judge Crystal Eller
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/s/ Cynthia Kelley
An Employee of Lewis Roca Rothgerber Christie LLP