

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

2 LYNN YAFCHAK, Statutory Heir and
3 Special Administrator to the ESTATE
4 OF JOAN YAFCHAK, Deceased,

5 Appellants,

6 vs.

7 LIFE CARE CENTERS OF
8 AMERICA, a foreign corporation d/b/a
9 LIFE CARE CENTER OF SOUTH
10 LAS VEGAS; and DOES 1-10,
 inclusive,

 Respondent.

Case No.: 82746

Electronically Filed
Mar 15 2022 09:27 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

11 **MOTION FOR EXTENSION TO FILE REPLY BRIEF**
12 **(SECOND REQUEST)**

13 Appellant Lynn Yafchak, Statutory Heir and Special Administrator to The
14 Estate of Joan Yafchak, Deceased, by and through her attorneys, Cogburn Law,
15 hereby moves this Court pursuant to NRAP 26(b)(1)(A) and NRAP 31(b)(3) for a
16 19-day extension of time through April 4, 2022, to file her reply brief as directed by
17 the Court's order, filed on February 8, 2022, directing Reply brief be filed.

18 The reply brief is currently due March 16, 2021. This is the second request
19 for an extension of time. Good cause exists to extend the deadline to file an opening
20 brief because the drafting and final review of the brief was delayed due to a death in
21 the family of one of the lead attorneys at this law firm.

1 Counsel for Appellant has reached out to counsel for Respondent and has been
2 advised that Respondent does not oppose an extension.

3 Accordingly, Appellant respectfully requests the Court grant this motion and
4 extend the deadline to file an opening brief by 19 days from March 16, 2022, to April
5 4, 2022. This motion is submitted in good faith and for good cause shown in
6 accordance with NRAP 26(b)(1).

7 Dated this 15th day of March 2022.

8
9 Respectfully submitted by:
Cogburn Law

10 By: */s/ Joseph J. Troiano*

11

Jamie S. Cogburn, Esq.
12 Nevada Bar No. 8409
Joseph J. Troiano, Esq.
13 Nevada Bar No. 12505
2580 St. Rose Parkway, Ste 330
14 Henderson, Nevada 89074
Attorneys for Appellants

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 20
- 21

Abraham Smith
Zachary Thompson
Casey Tyler
Micah Echols
Joel Henriod
Daniel Polsenberg
David Snyder

/s/Noel Raleigh
An employee of Cogburn Law