

IN THE SUPREME COURT OF THE STATE OF NEVADA

YEONHEE LEE,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE DAVID M. JONES,
DISTRICT JUDGE,

Respondents,

and

ALBERTO EDUARDO CARIO,

Real Party in Interest

Case No. 82831

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Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR EXTENSION TO FILE ANSWERING BRIEF

[First Request]

Real Party in Interest Alberto Eduardo Cario, by and through his attorneys, MAIER GUTIERREZ & ASSOCIATES, hereby moves this Court pursuant to NRAP 26(b)(1)(A) and NRAP 31(b)(3) for a 30-day extension of time through July 26, 2021, to file his answering brief as directed by the Court's order directing answer filed on May 28, 2021.

The answering brief is currently due June 25, 2021. This is the first request for an extension of time. Good cause exists to extend the deadline to file an answering brief because this writ petition presents an issue of first impression implicating separation of powers, statutory interpretation, and the proper method of analysis for directly contradictory provisions of a statute and rule of civil procedure. Additionally, counsel for Real Party in Interest was recently informed that there may be up to five other cases on appeal on this same issue, and counsel needs additional

time to review each of these other cases in order to concisely address the issues raised in this proceeding.

Accordingly, Real Party in Interest respectfully requests the Court grant this motion and extend the deadline to file an answering brief by 30 days from June 25, 2021, to July 26, 2021. This motion is submitted in good faith and for good cause shown in accordance with NRAP 26(b)(1).

DATED this 15th day of June, 2021.

Respectfully submitted,

MAIER GUTIERREZ & ASSOCIATES

/s/ Jason R. Maier

JASON R. MAIER, ESQ.

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CERTIFICATE OF SERVICE

I certify that on the 15th day of June, 2021, this document was electronically filed with the Nevada Supreme Court, thus electronic service of the foregoing **MOTION FOR EXTENSION TO FILE ANSWERING BRIEF [First Request]** shall be made in accordance with the Master Service List as follows:

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A copy of was delivered by first class mail with sufficient postage prepaid to the following address(es):

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Eighth Judicial District Court, Dept. 29
Regional Justice Center
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Las Vegas, Nevada 89155

Office of the Attorney General
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Carson City, Nevada 89701

/s/ Natalie Vazquez

An Employee of MAIER GUTIERREZ & ASSOCIATES